

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH
A Certified Unified Program Agency

FACILITY CLOSURE NOTIFICATION FORM

Facility Name: _____
Facility Address: _____
Mailing Address: _____
Business phone: _____ Contact person/Title: _____

No hazardous or potentially hazardous items are to be removed from the site until the Closure Notification Form and/or a Closure Plan has (have) been submitted and approved.

Check all boxes relating to the facility to be closed:

- | | |
|--|---|
| <input type="checkbox"/> Limited closure (only a portion of the business operation) Describe Area: _____ | |
| <input type="checkbox"/> Full Business Closure – Describe square footage used for hazardous materials: _____ | |
| <input type="checkbox"/> Full Site Closure (buildings to be demolished/redevelopment of property) Describe site, size, no. of buildings and hazardous materials areas: _____ | |
| <input type="checkbox"/> Generated hazardous waste | <input type="checkbox"/> Underground tanks # _____ |
| <input type="checkbox"/> Tiered permit unit (e.g., PBR, CE, etc.) | <input type="checkbox"/> Aboveground tanks # _____ |
| <input type="checkbox"/> Waste treatment system | <input type="checkbox"/> Vehicle or engine maintenance |
| <input type="checkbox"/> Discharges to sanitary sewer | <input type="checkbox"/> Parts washer |
| <input type="checkbox"/> HMBP on file | <input type="checkbox"/> Degreaser unit |
| <input type="checkbox"/> Dry cleaner | <input type="checkbox"/> CFC or HCFC appliances present |
| <input type="checkbox"/> Photo developer | <input type="checkbox"/> Plating shop |
| <input type="checkbox"/> One piece of equipment only | <input type="checkbox"/> Semiconductor fab |
| <input type="checkbox"/> Subject to Federal ARP or CAL ARP | <input type="checkbox"/> Dispensing of flammable or combustible liquids |
| <input type="checkbox"/> BAAQMD permit | <input type="checkbox"/> sandblasting or metals deposition |
| <input type="checkbox"/> Compressed gas cylinder(s) | <input type="checkbox"/> Barrel/drum storage |
| <input type="checkbox"/> Scrubbers/fume hoods/ducting | <input type="checkbox"/> Trenches/containment areas |
| <input type="checkbox"/> Sumps, hoists | <input type="checkbox"/> Chemical storage cabinets |
| <input type="checkbox"/> Radioactive materials | <input type="checkbox"/> More than one building |
| <input type="checkbox"/> Biohazards | <input type="checkbox"/> Other: _____ |

A closure plan approved by Alameda County Department of Environmental Health is required for facilities that are to be closed or for any storage/use/handling/processing area(s) that are to be closed. Facility Closure Plans and Notifications are to be submitted **no less than 30 days prior to** the intended date of closure.

This document must be signed by the Facility Manager, an Officer of the Company, property owner, or other responsible party (not the consultant or contractor).

I hereby certify under penalty of perjury that the information contained in this FACILITY CLOSURE NOTIFICATION is true and correct. I recognize the CUPA has full right-of-entry to my complete facility for the purpose of investigation and inspection to demonstrate compliance with this Application and applicable state and local regulations.

Authorized Signature/Date: _____

Printed Name/ Title: _____

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 Alameda County Department of Environmental Health (ACDEH). A Closure Plan approved by the ACDEH is required if any Hazardous Materials Facility, or any storage area therein, is to be closed. The facility manager or owner, or the property owner shall submit the plan.

The Closure Plan must be submitted to ACDEH 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 ACDEH 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.

Closure Plan elements

1. A completed Closure Notification form.
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. 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 EPA and State (e.g., DTSC) requirements.
 11. A spill contingency and safety plan that covers the closure activities shall be included.

Post Closure Report

A final closure report must be submitted to the ACDEH 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.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
CLOSURE REQUIREMENTS
FOR
GENERATORS & TIERED PERMITTING FACILITIES
 FEBRUARY 2000

	HAZ. WASTE GENERATOR	CONDITIONAL EXEMPTION	CONDITIONAL AUTHORIZATION	PERMIT BY RULE (TTU/FTU)
Type of Facility	Onsite	Onsite	Onsite	Onsite - TTU & FTU
Closure Requirements	<p>Title 22 CCR 66262.34(a)(1) Specified requirements apply to 90 day generators with certain tanks, containers, drip pads, and containment buildings. <u>Title 22 CCR 66265.197</u> 90 day accumulation tanks and containers without secondary containment are subject to full closure requirements. <u>Title 22 CCR 66265.445(c)(1)(A)</u> Drip pads (w/o liners) from wood treatment facilities are subject to full closure requirements. <u>Title 22 CCR 66265.1102</u> Containment building are subject to full closure requirements.</p> <p>-----</p> <p>Title 22 CCR 66265.111 Requires generator to close facility in a manner that minimizes further maintenance and is protective of public health and environment. Title 22 CCR 66265.114 Requires generator to properly dispose of all contamination generated during closure.</p>	<p>Generator Requirements Plus:</p> <p>H&SC 25201.5(d)(8)(A) Requires removal or decontamination of all haz. waste/ constituents resulting from unit closure.</p> <p>-----</p> <p>H&SC 25201.5(d)(9) Requires compliance with all generator requirements including: Title 22 66262.34 (see Hazardous Waste Generator requirements).</p> <p>H&SC 25201.5(e)(1) <u>Exempts</u> tanks and containers ancillary equipment from 66265.193 requirements, if specified conditions are met, unless otherwise required by federal law.</p> <p>Title 23 CCR 2672 Applies to the cleanup of contamination resulting from underground tank closures.</p> <p>Title 22 CCR 67383.1 to 67383.5 Requirements for the management of aboveground and underground tanks that held haz. waste or haz. materials and are themselves classified as haz. wastes.</p>	<p>Generator Requirements Plus:</p> <p>H&SC 25200.3(g)(1) Requires removal or decontamination of all haz. waste/ constituents resulting from unit closure.</p> <p>-----</p> <p>H&SC 25200.3(c)(4)(A) <u>Exempts</u> tanks and containers ancillary equipment from 66265.193 requirements, if specified conditions are met, unless otherwise required by federal law.</p> <p>Title 23 CCR 2672 Applies to the cleanup of contamination resulting from underground tank closures.</p> <p>Title 22 CCR 67383.1 to 67383.5 Requirements for the management of aboveground and underground tanks that held haz. waste or haz. materials and are themselves classified as haz. wastes.</p>	<p>Title 22 CCR 67450.3(b)(13)(A)-TTU Title 22 CCR 67450.3(c)(11)(A)-FTU Maintain compliance with the following closure requirements: Section 66264.178, 66265.111(a) and 66265.111(b), 66265.114.</p> <p>-----</p> <p>Title 22 CCR 67450.3(a)(11)(F)-TTU Title 22 CCR 67450.3(c)(11)(B)-FTU Applicable tank systems are subject to additional closure requirements pursuant to Title 22, CCR, Article 10, Chapter 15.</p> <p>-----</p> <p>Title 22 CCR 66265.404 Applies to owners and operators (O/O) of facilities which treat hazardous wastes by chemical, physical, or biological methods in other than tanks, surface impoundments, and land treatment facilities. Requires that all hazardous waste and hazardous waste residues be removed from treatment processes or equipment, discharge control equipment, and discharge confinement structures.</p>

	HAZ. WASTE GENERATOR	CONDITIONAL EXEMPTION	CONDITIONAL AUTHORIZATION	PERMIT BY RULE (TTU/FTU)
Closure Plan	No written closure plan is required unless one or more of the following specified 90 day generator requirements applies: Title 22 CCR 66265.197(a) 90 day accumulation tanks and containers without secondary containment are subject to closure plan requirements specified in Article 7 of Chapter 15. Title 22 CCR 66265.445(c)(1)(A) Drip pads (w/o liners) from wood treatment facilities are subject to closure plan requirements. Title 22 CCR 66265.1102(a) Containment building are subject to closure plan requirements.	No written closure plan required unless a specified 90 day generator requirement applies.	No written closure plan required unless a specified 90 day generator requirement applies.	Title 22 CCR 67450.3(a)(13)(B)-TTU Title 22 CCR 67450.3(c)(11)(B)-FTU Closure plan requirements. The plan must be kept onsite and does not have to be approved by CUPA or DTSC. ----- Title 22 CCR 67450.3(a)(13)(C)-TTU Title 22 CCR 67450.3(c)(11)(C)-FTU <u>TTU</u> - O/O shall amend the closure plan at any time during the active life of the TTU(s) when changes in operating plans or TTU design affect the closure plan, or whenever there is a change in the expected year of closure. <u>FTU</u> - Amendments to the closure plan must comply with Section 66265.112(c).
Closure Time Requirements & Notification	Notification of closure may be required by some local ordinances.	Same as generator requirements plus: H&SC 25201.5(d)(8)(A) Upon terminating operations, the generator shall initiate closure activities by removing all waste residues. ----- H&SC 25201.5(d)(8)(B) Requires generator to provide written notification to DTSC and the CUPA or the authorized unified program agency upon the completion of all closure activities.	Same as generator requirements plus: H&SC 25200.3(g)(1) Upon terminating operations, the generator shall initiate closure activities by removing all waste residues. ----- H&SC 25200.3(g)(2) Requires generator to provide written notification to DTSC and the CUPA or the authorized unified program agency upon the completion of all closure activities.	Title 22 CCR 67450.3(a)(13)(D)-TTU Title 22 CCR 67450.3(c)(11)(D)-FTU O/O shall treat, remove or dispose of all hazardous waste within 90 days after final volume is treated. ----- Title 22 CCR 67450.3(a)(13)(E)-TTU Title 22 CCR 67450.3(c)(11)(E)-FTU Closure shall be completed within 180 days after treating final volume of hazardous waste. ----- Title 22 CCR 67450.3(a)(13)(F)-TTU Title 22 CCR 67450.3(c)(11)(F)-FTU O/O shall notify CUPA (and DTSC for TTUs) or authorized UP agency 15 days prior to completion of closure.

	HAZ. WASTE GENERATOR	CONDITIONAL EXEMPTION	CONDITIONAL AUTHORIZATION	PERMIT BY RULE (TTU/FTU)
Certification	Certification of closure may be required by some local ordinances.	H&SC 25201.5(d)(8)(B) Requires generator to submit certification when all treatment activities have ceased.	H&SC 25200.3(g)(2) Requires generator to submit notification to DTSC and CUPA (or authorized officer or agency if no CUPA) when all treatment activities have ceased.	Title 22 CCR 67450.3(a)(13)(G)-TTU Title 22 CCR 67450.3(c)(11)(G)-FTU Requires submittal of a certification signed by the O/O and a CA registered professional engineer stating closure completed in accordance with the closure plan.
Financial Responsibility	Not required unless one or more of the following specified 90 day generator requirements apply to certain tanks/containers, drip pads, and containment buildings: Title 22 CCR 66262.34(a)(1) Financial responsibility requirements apply to generators for applicable tanks, containers and drip pads, and containment buildings. <u>Title 22 CCR 66265.197(a)</u> 90 day accumulation tanks without secondary containment are subject to financial responsibility requirements. <u>Title 22 CCR 66265.445(c)(1)(A)</u> Drip pads (w/o liners) from wood treatment facilities are subject to financial responsibility requirements. <u>Title 22 CCR 66265.1102(a)</u> Containment buildings are subject to financial responsibility requirements.	Not required unless a specified generator requirement applies.	H&SC 25245.4(b)(1)(B) Generator must obtain financial assurance for closure on and after 10/1/96. Title 22 CCR 67450.13(a)(5) Generator must obtain financial assurance for closure on or after 10/1/96. Title 22 CCR 67450.13(a)(1) Generator must prepare written cost estimate for the closure of each unit. Section 67450.13(a)(2) requires closure cost estimate to be adjusted for inflation by March 1 of each year. ----- Title 22 CCR 67450.13(d) Facilities with closure cost estimates below \$10,000 are allowed to self-certify in accordance with section 66270.11 that they have sufficient resources to meet closure cost requirements.	H&SC 25245.4(a)(1)(B)-TTU&FTU O/O must obtain financial assurance for closure on and after 10/1/96. Title 22 CCR 67450.13(a)(5) O/O must obtain financial assurance for closure on or after 10/1/96. Title 22 CCR 67450.13(a)(1) O/O must prepare written cost estimate for the closure of each unit. Section 67450.13(a)(2) requires closure cost estimate to be adjusted for inflation by March 1 of each year. ----- H&SC 25245.4(a)(1)(B)-TTU&FTU O/O must obtain financial assurance for closure unless exempt. Title 22 CCR 67450.13(e)-TTU&FTU O/O is <u>exempt</u> from financial assurance requirements if facility operated no more than 30 days in any calendar year. <u>FTU</u> exemption self-certification form must be submitted to CUPA or DTSC in non-CUPA jurisdiction. <u>TTU</u> exemption self-certification must be submitted to DTSC.
Wastestreams	RCRA and Non-RCRA waste	Primarily non-RCRA waste and certain RCRA wastes pursuant to H&SC 25201.5(a) and (c)	Primarily non-RCRA wastes and certain RCRA wastes pursuant to H&SC 25200.3(a)	Both non-RCRA wastes and certain RCRA wastes pursuant to 67450.11-TTU&FTU

	HAZ. WASTE GENERATOR	CONDITIONAL EXEMPTION	CONDITIONAL AUTHORIZATION	PERMIT BY RULE (TTU/FTU)
Relative Risk to Public Health & Environment	Low	Low	Low	Medium
Corrective Action & Phase I	<p>H&SC 25189.2(c) Prohibits the on-site disposal of hazardous waste at an unauthorized point by a generator.</p> <p>H&SC 25187 Allows DTSC to issue an order specifying a schedule for compliance or correction for any release of haz. waste or constituents into the environment.</p> <p>----- Phase I not required.</p>	<p>H&SC 25189.2(c) Prohibits the on-site disposal of hazardous waste at an unauthorized point by a generator.</p> <p>H&SC 25201.5(d)(8)(A) Requires generator to remove or decontaminate all waste residues associated with the closure of a unit including soils, and structures or equipment contaminated with hazardous waste from the unit.</p> <p>H&SC 25187 Allows DTSC to issue an order specifying a schedule for compliance or correction for any release of haz. waste or constituents into the environment.</p> <p>----- Phase I not required.</p>	<p>H&SC 25189.2(c) Prohibits the on-site disposal of hazardous waste at an unauthorized point by a generator.</p> <p>H&SC 25200.3(c)(3) Generator shall comply with Phase I environmental assessment procedures per H&SC 25200.14. Requires removal or decontamination of all haz. waste/constituents resulting from unit closure. If contamination is found, generator is responsible for expeditious cleanup.</p> <p>H&SC 25187 Allows DTSC to issue an order specifying a schedule for compliance or correction for any release of haz. waste or constituents into the environment.</p> <p>H&SC 25404.1(a)(3)(A) Allows only DTSC to implement and enforce the requirements of Sections 25200.3(c)(3) and 25200.14.</p> <p>----- H&SC 25200.14(b)(1) Requires a Phase I environmental assessment for all CA facilities.</p>	<p>H&SC 25200.10(b)-TTU&FTU Requires corrective action for all haz. waste/constituent releases.</p> <p>Title 22 CCR 67450.7-TTU&FTU Requires O/O to establish a corrective action program consisting of a Phase I environmental assessment and remediation if a release haz. waste or constituents has occurred.</p> <p>H&SC 25187-TTU&FTU Allows DTSC to issue an order specifying a schedule for compliance or correction for any release of haz. waste or constituents into the environ.</p> <p>H&SC 25404.1(a)(3)(A) Allows only DTSC to implement and enforce the requirements of Sections 25200.10 and 25200.14.</p> <p>----- H&SC 25200.14(b)(1) -TTU&FTU Requires a Phase I environmental assessment for all PBR facilities.</p>

	HAZ. WASTE GENERATOR	CONDITIONAL EXEMPTION	CONDITIONAL AUTHORIZATION	PERMIT BY RULE (TTU/FTU)
Post Closure	<p>Not required if clean closure.</p> <p>H&SC 25189.2(c) prohibits the on-site disposal of hazardous waste at an unauthorized point by a generator.</p> <p>-----</p> <p>Post closure is not required unless one or more of the following specified 90 day generator requirements apply to certain tanks/containers, drip pads, and containment buildings: Title 22 CCR 66262.34(a)(1) Post closure requirements apply to generators for applicable tanks and drip pads, and containment buildings. <u>Title 22 CCR 66265.197(b)</u> Post closure is required for tanks without secondary containment if all contaminated soils cannot be removed or decontaminated. <u>Title 22 CCR 66265.445(c)(1)(B)</u> Post closure plan is required for drip pads (w/o liners) from wood treatment facilities which do not comply with liner requirements pursuant to 66265.443(b)(1). <u>Title 22 CCR 66265.1102(b)</u> Post closure is required for containment buildings if all contaminated soils cannot be removed or decontaminated.</p>	<p>Not required if clean closure.</p> <p>If contamination remains after closure, then the facility is also subject to all applicable generator requirements, including requirements for landfills, pursuant to H&SC 25201.5(d)(9).</p>	<p>Not required if clean closure.</p> <p>H&SC 25245.4(b)(3) Generator shall not be required to provide financial assurances for post closure maintenance pursuant to H&SC 25245(a)(2).</p> <p>If contamination remains after closure, then the facility is also subject to generator requirements, including requirements for landfills, pursuant to H&SC 25200.3(c)(1).</p>	<p>Not required if clean closure.</p> <p>H&SC 25245.4(a)(3)-TTU&FTU Generator shall not be required to provide financial assurances for post closure maintenance pursuant to H&SC 25245(a)(2).</p> <p>If contamination remains at either TTU&FTU after closure, the owner/operator is subject to H&SC 25200.10(b) which requires corrective action for all haz. waste/constituent releases.</p> <p>Title 22 CCR 67450.3(a)(11)(F)-TTU Title 22 CCR 67450.3(c)(9)(F)-FTU Post closure plan is required for tank systems.</p>