



County of Santa Clara
Department of Environmental Health – Debris Removal
1555 Berger Drive #300, San Jose, CA 95112
Email: DEHWildfire@cep.sccgov.org
Phone: (408) 918-3411
www.EHInfo.org/fire

COUNTY OF SANTA CLARA TEMPLATE WORKPLAN FOR PRIVATE CONTRACTOR WILDFIRE DEBRIS REMOVAL PROGRAM

OVERVIEW

To ensure safety to workers, the public and the environment, property owners, contractors and consultants must follow proper protocols when removing structural ash and debris resulting from the SCU Lightning Complex Fires. The County is offering two ways for property owners to manage the fire debris and ash from the wildfire disaster:

1. Participate in the publicly-funded Consolidated Debris Removal Program operated by the California Office of Emergency Services (CalOES) in conjunction with other State and Federal agencies, through which wildfire ash and debris are removed and disposed of at no direct cost to the property owner. Property owners must submit a Right of Entry Form to DEH by **December 15, 2020** to enroll in the Consolidated Debris Removal Program; or
2. Participate in the Private Contractor Debris Removal Program to remove wildfire debris and ash at your own expense and subject to County oversight and approval by submitting the County of Santa Clara Private Contractor Debris Removal Program Application (Private Contractor Program Application) and this Workplan to the County of Santa Clara Department of Environmental Health (DEH). The Application and Workplan must be filed with the County by **December 15, 2020**.

Properties whose fire debris is limited to fences, non-structural wood materials, and non-residential structures less than 120 square feet that did not contain hazardous substances such as paint, fuels, oils, pesticides, herbicides, propane, or asbestos may apply to DEH for a conditional exemption from the Private Contractor Debris Removal Program. Additional exemptions may be granted on a case by case basis for non-residential structures greater than 120 square feet that did not contain any hazardous materials and pose a minimal risk to human health and the environment. Property owners who have received a conditional exemption for their parcel are not required to complete a Private Contractor Program Application and Workplan for that parcel.

This document is a standard template for the Private Contractor Debris Removal Program Workplan. Property owners/contractors must complete debris removal and cleanup to standards published by DEH and contained in this Workplan Template and the Private Contractor Program Application. These standards are established to ensure protection of the public health and environment.

Complete and submit both the completed Workplan and the Private Contractor Program Application to Department of Environmental Health - Debris Removal at 1555 Berger Drive #300, San Jose, CA 95112, or send to DEHWildfire@cep.sccgov.org. The deadline to submit the Application and Workplan is **December 15, 2020**.

All contractors must review and comply with State and County Health Officer Orders and directives governing construction work during the COVID-19 pandemic, including the County Health Officer's [Mandatory Directive for Construction Projects](#) and the State's [COVID-19 Industry Guidance: Construction](#). They must also submit a Social Distancing Protocol to the County Public Health Department at www.COVID19prepared.org prior to performing work in the County.



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1.0 Project Overview

1.1 Property Information and Property Owners	
Property Owner Name:	
Phone Number(s):	
Property Address:	
City/State/Zip:	
Assessor's Parcel Number (APN):	
Email:	
Mailing Address:	
City/State/Zip	

1.2 List of Contractor(s) and Consultant(s)	
Name of Contractor:	Email:
License Number:	Mobile Phone #
Name of Contractor:	Email:
License Number:	Mobile Phone #
Name of Contractor:	Email:
License Number:	Mobile Phone #
Name of Contractor:	Email:
License Number:	Mobile Phone #

1.3 Scope of Work: Provide a brief description of property and proposed activities (Footprint, description of structures and/or debris). Attach Photos/Sketches of ash footprint.

Identify/discuss proposed equipment material staging areas:

Identify/discuss Site Health and Safety Protocols and Traffic Control:

If applicable, damaged water wells and/or water lines on property will be addressed in the following manner:

If applicable, damaged septic systems and/or sewer lines on property will be addressed in the following manner:

1.4 REQUIRED Notifications / Permits
The following notifications will be made, and permits obtained:
Underground Service Alert (USA) – Call 811 Dig Alert prior to digging.
Obtain approval of your Private Contractor Program Application from: County of Santa Clara Department of Environmental Health – Debris Removal, 1555 Berger Drive #300, San Jose, or by email: DEHWildfire@cep.sccgov.org .

2.0 Background Site Assessment

2.1 Site Testing and Analysis Plan (Asbestos and Soil):

Depending on site conditions, property owners may be required to hire a certified asbestos consultant and soil consultant to test the site.

Site testing and analysis for asbestos and soil will be addressed in the following manner:

Submit a report of the asbestos survey with analytical reports to DEH for disposal authorization.

2.2 Foundation Analysis and Plan

In general, the structural integrity of concrete and masonry can be adversely affected in fire situations, especially when the structure is completely consumed by the fire. The properties of the material may be irreversibly altered deeming it unsatisfactory for reuse in supporting a rebuilt structure.

Property owners have two options:

1. Completely remove and dispose of foundation,
2. If foundation is to remain in place, testing and an engineer's certification including testing data is required. Foundations are retained at the property owner's own risk and may not be accepted by the County for reuse and/or rebuild.

Structural foundations on the property will be addressed in the following manner:

Disposal facility(s) for structural foundations

3.0 Hazardous Waste and Asbestos Removal

3.1 Hazardous Waste and Asbestos Removal

During Phase I of the Consolidated Debris Removal Program, experts from the USEPA and USEPA contractors inspected the property and removed any identifiable and accessible household hazardous waste that may pose a threat to human health, animals, and the environment, such as batteries, oil, propane tanks, visible bulk asbestos, and paints. However, some hazardous materials and/or asbestos or asbestos-containing materials (ACM) may still be present on the property and pose a threat to public health and the environment. Proper protection should be worn when handling, sorting, and transporting these materials (sturdy footwear, gloves, respiratory protection).

3.2 Hazardous Waste and Household Hazardous Waste Removal

All remaining hazardous waste and household hazardous waste (HHW) shall be identified and disposed of by a certified hazardous waste contractor. Household hazardous wastes (batteries, propane tanks, paint, gasoline cans, cleaning products, pesticides, fluorescent light bulbs, etc.) must be identified, segregated, and disposed of properly.

Certified Hazardous Materials/Waste Contractor	
Name:	
License No.:	
Disposal and/or Recycling Facility(s)	

Submit a report of the hazardous waste survey and disposal documentation to DEH for disposal authorization.

3.3 Asbestos Removal

Asbestos or ACM requires assessment by a Certified Asbestos Consultant. **This must be completed for all properties participating in the Private Contractor Program.** Asbestos and asbestos containing material must be removed by a licensed Asbestos Abatement Contractor. If bulk loading ACM, the bin or container used for transport shall be double-lined with 10-mil poly in such a way that once loaded both layers can be sealed up independently ("burrito-wrap method").

Asbestos Handling and Removal Procedures	
Certified Asbestos Consultant hired to test the site	
Name:	
License No.:	
Asbestos Removal Contractor	
Name:	
License No:	

3.4 Protocols for Fugitive Dust Control

Property owners or their contractors must provide water or an approved dust palliative, or both, to prevent a dust nuisance at the site. Dust resulting from performance of the work will be controlled at all times in a manner that does not generate runoff. Dust Control Methods include:

- **Control 1-** Water or an approved dust palliative, or both, will be used to prevent dust nuisance at each site. Each area where ash and debris are to be removed will be pre-watered with a fine spray nozzle in advance of initiating debris removal and as needed during the removal.
- **Control 2-** All loads shall be covered with a tarp; this includes metal debris. Ash and debris loads shall be fully encapsulated with 10-millimeter plastic ("burrito wrap" method). Concrete loads are exempt from a tarp provided the loads are wetted prior to leaving. If concrete loads generate dust, then the loads must be wetted and covered.
- **Control 3-** All waste material that is not unloaded at the end of each workday will be consolidated, sufficiently wetted, and/or covered to prevent the offsite migration of contaminants.
- **Control 4-** All visibly dry disturbed soil surface areas of operation should be watered to minimize dust emissions during performance of work.
- **Control 5-** Speeds must be reduced when driving on unpaved roadways.
- **Control 6-** Procedures will be implemented to prevent or minimize dirt, soil or ash contaminating roadways, neighboring parcels, or creating an airborne health hazard.

In addition to the above listed methods, dust from debris removal activities on the property will be addressed in the following manner:

4.0 Debris Removal and Disposal / Recycling

Remove ash, debris, contaminated soil, metals, and concrete from the site and dispose of properly. Metals and concrete shall be recycled if possible. Appliances and vehicles shall be handled properly to meet the requirements of metals recycling facilities. All waste shall be disposed of at an approved location.

Debris shall be handled in the following manner:

4.1 Ash, Fire Debris and Soil
4.2 Metals Including Vehicles and Appliances
4.3 Concrete, Brick & Masonry

Ash and debris must be assessed to confirm the absence of hazardous waste and asbestos prior to disposing of this waste in a solid waste facility. Solid waste facilities may require certification or documentation that ash and debris has been assessed for hazardous waste and asbestos.

5.0 Soil Grading and Erosion Control

5.1. Description of Grading

After burn ash and debris are cleaned from the property to a level of visually clean, remove 3 to 6 inches of soil from the impacted area. Soil shall be properly disposed of as described in 4.1 above.

5.2 Description of Erosion Controls

When active fire ends, it leaves behind bare dirt or decreased vegetative cover. Because of the loss of vegetation, the top layer of soil becomes loosened, making it vulnerable to increased runoff, erosion, and sedimentation. Erosion and sediment stabilization practices must be implemented to keep sediment and debris from impacting homes, including use of hay and seed with straw wattle or other erosion control material to maintain erosion control and prevent water runoff. Erosion and sediment stabilization techniques to be used are listed below and are consistent with recognized Best Management Practices.

Describe erosion and sediment stabilization techniques to be used on the property.

6.0 Confirmation Sampling

The following initial health screening levels apply to soil confirmation sampling after completion of visible cleanup of properties. These are initial health screening criteria in the absence of background data. Testing of metals must be performed by EPA Lab Method 6020. A qualified soil consultant shall collect soil samples from a depth of 0-3 inches for confirmation sampling and compare results to cleanup goals. Three samples shall be taken at a depth of 3-9 inches outside the ash footprint (20 ft. minimum) to act as background samples to determine if naturally occurring levels of any metals tested are above the cleanup goals. If samples from the ash footprint are below the cleanup goals, then the lab will not need to test the background samples. If sample results for any metals are above the cleanup goals but are at or below the background sample results, this must be adequately explained by your soil consultant in the final testing report.

In lieu of performing confirmation sampling through a licensed soil consultant, property owners may request that DEH conduct a visual confirmation inspection of ash footprints on the property. Property owners are advised that DEH confirmation inspections cannot be guaranteed, and additional soil confirmation sampling may be required depending on site conditions.

Soil Consultant Collecting Samples	
Name:	
License No.:	

State-certified Laboratory	
Name:	
License No.:	
DEH Confirmation Inspection Requested in Lieu of Private Sampling? (Yes/No)	

Analyte	Initial Health Screening Level (mg/Kg)	Screening Level
Antimony	11	RWQCB ESL
Arsenic	0.067	RWQCB ESL
Barium	3,000	RWQCB ESL
Beryllium	16	DTSC HERO Note 3
Cadmium	51	RWQCB ESL
Chromium	117,000	USEPA RSL
Cobalt	23	RWQCB ESL
Copper	3,100	RWQCB ESL
Lead	80	DTSC HERO Note 3
Mercury	1	DTSC HERO Note 3
Molybdenum	390	RWQCB ESL
Nickel	820	DTSC HERO Note 3
Selenium	390	RWQCB ESL
Silver	390	RWQCB ESL
Thallium	0.78	RWQCB ESL
Vanadium	390	RWQCB ESL
Zinc	23,000	RWQCB ESL

ESLs: Environmental Screening Levels (ESLs) published by the California Regional Water Quality Control Board, San Francisco Bay Region (CRWQCB-SFBR), 2019 (Rev. 2) Update

HERO Note 3: California Department of Toxic Substances Control (DTSC) Office of Human and Ecological Risk (HERO) Human Health Risk Assessment Note Number 3, June 2020 Update

RSLs: United States Environmental Protection Agency (US EPA) Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs), May 2020 Update

7.0 Hazard Trees

Property owners must arrange for the removal of Hazard Trees from their private property. A Hazard Tree is defined as a tree that is so damaged by the SCU Lightning Complex Fires that its structural integrity is compromised and it: (1) poses an immediate threat of falling onto work crews or obstructing access to the debris clearance site, or (2) presents a threat of public health or safety due to risk of falling onto a public right of way or public infrastructure. List any Hazard Trees identified on the property subject to this Workplan and disclose plans for their removal:

Identify Hazard Trees on the property and Hazard Tree removal plan:

8.0 Final Report

After implementation of the approved Workplan, the Private Contractor Fire Debris Removal Program Cleanup Completion Certification shall be submitted to DEH.

9.0 Attachments (Vicinity Map, Plan Maps, Photographs, Drawings, Laboratory Test Results, Etc.)