

# Coordinating Cleanup After the Disaster

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SONOMA COUNTY



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24 lives lost

Tubbs – 36,807 acres

Nuns – 56,556 acres

Pocket – 17,357 acres

Burned 23 days

Repopulation while still burning

Buildings destroyed 6,686 (5,143 residential)



# Hazards

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## Two Stories



# Hazards

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## Two Stories

- Pesticides, Batteries, Paint, Ammunition, Car Parts, Appliances, Building Materials
- Asbestos, heavy metals, PCBs
- Victim exposure
- Worker exposure
- Community exposure



# A Public Cleanup - Why?

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## Compare

- Lack of Local Capabilities
- Insufficient insurance
- Environmental Risks
- Coordination

## With

- Monetary Uncertainties
- Lack of Remedies
- Lack of Control

# Two Phase Public Cleanup

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- Phase 1: HHW sweeps
- Phase 2: Debris Removal
  - either public or private
  - but pursuant to a single standard
- Roles?
  - DTSC/EPA
  - CalRecycle/USACE

# Local Implementation

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- Local Emergency Proclamation (GC 8630)
- Health Emergency Proclamation By The Health Officer (H&S 101075)
- Health Officer Order (H&S 101040)
  - Required HHW Sweep
- Emergency Ordinance
  - Same Standards, Different Implementation for City and County
- Multiple Local Enforcement Agency waivers
- RWQCB waiver for landfill
- Notifications



# Phase 1 (HHW Sweep)

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- Exigent Circumstances
  - Supported by Health Officer Order
- No Right of Entry





# Phase 2 (Public or Private)

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Either

- Right of Entry forms
  - Functioned as a single local cleanup permit
  - Indemnification (required)
  - Assignment of debris removal insurance (preventing duplication of benefits)

Or

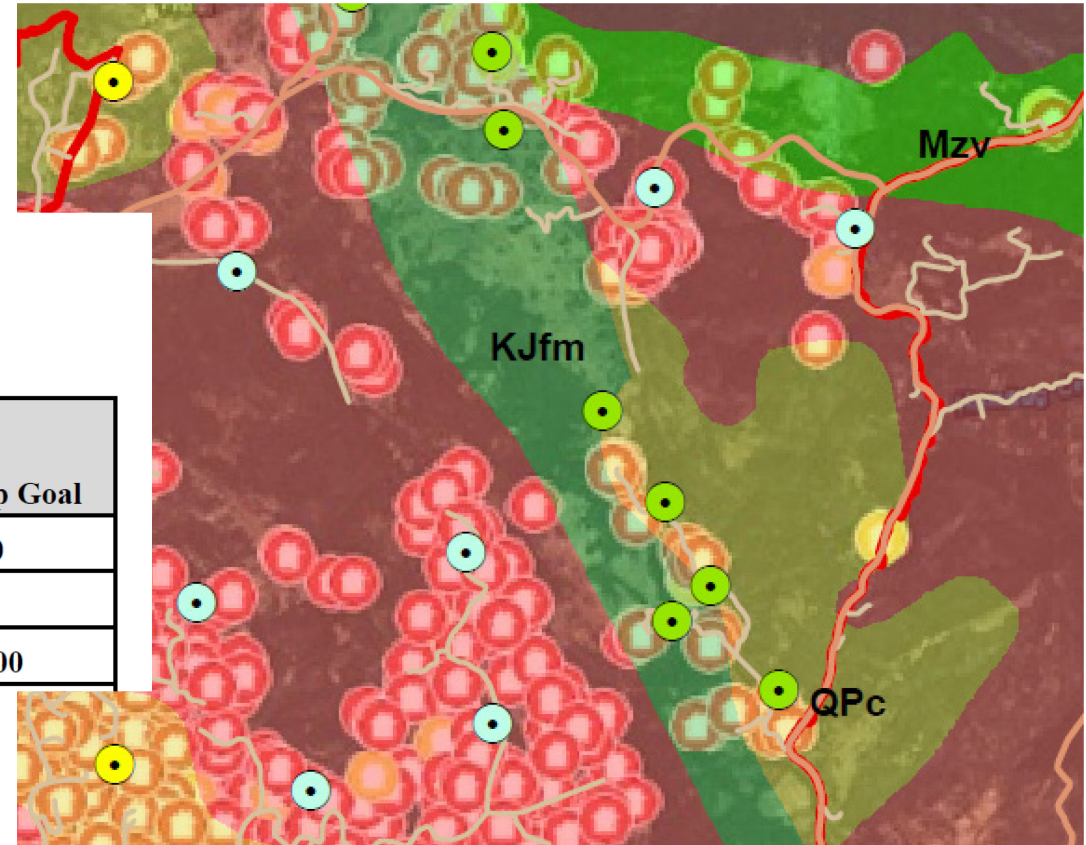
- “Alternative Program”
- **Deadlines**

# Phase 2 (standards)

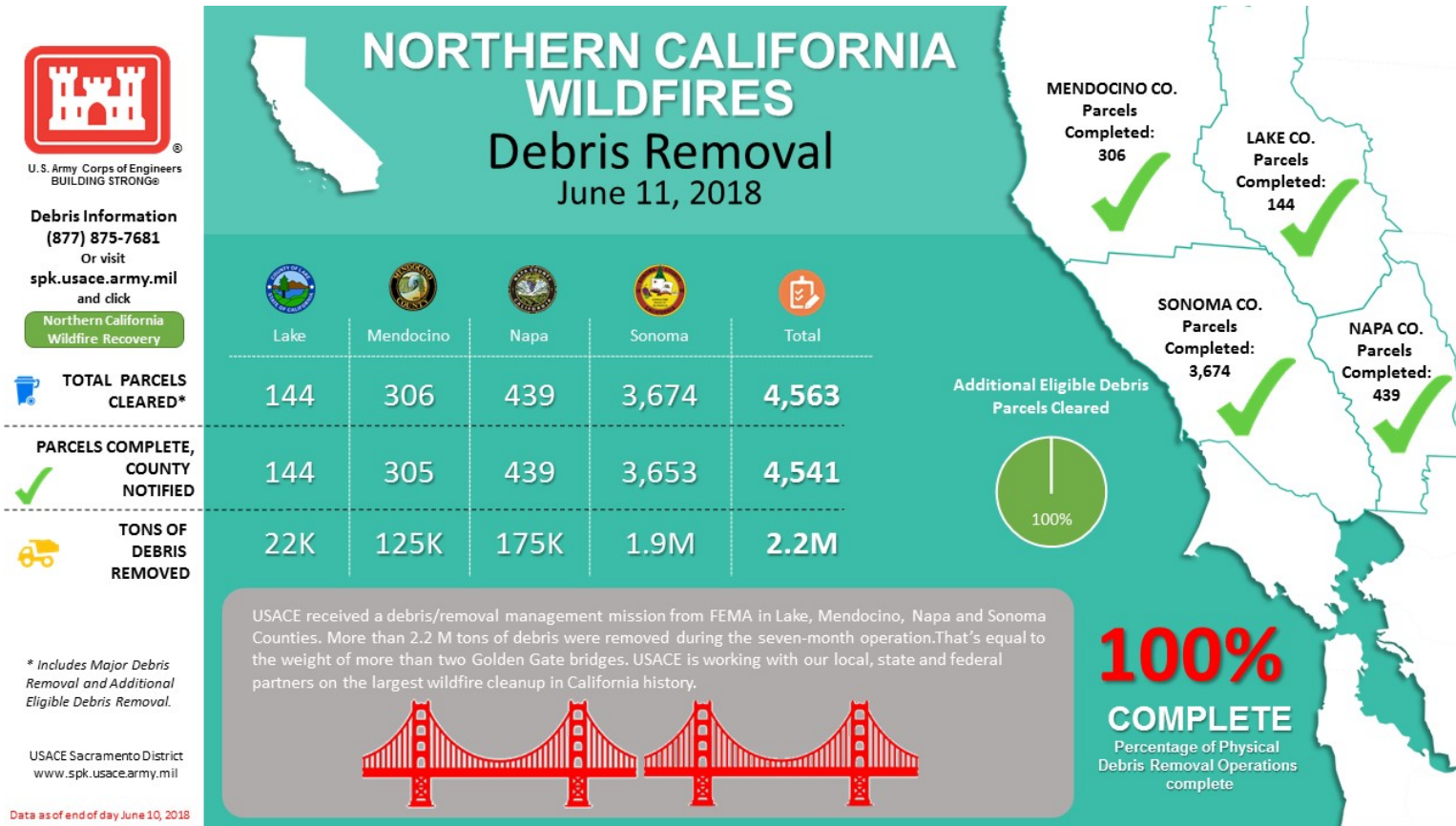
- Guidance Without Regulations

**TABLE 1.**  
**CLEANUP GOALS FOR METALS IN SOIL**  
**SONOMA COUNTY, POCKET FIRE INCIDENT**  
**KJFM GEOLOGIC AREA**

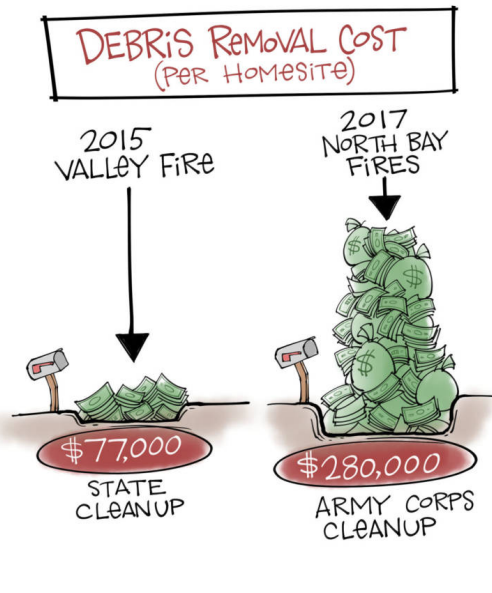
Metal	Background	US EPA RSL <sup>(a)</sup>	CalEPA CHHSL <sup>(b)</sup>	DTSC HERO <sup>(c)</sup>	Cleanup Goal
Antimony	0.278	31	30	-	30
Arsenic	8.006	0.7	0.1	0.07	8
Barium	640	15,000	5,200	-	5,200



# Phase 2



# Controversy



# “Alternative” Program

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- Multiple Policy Decisions
  - New Urgency Ordinance / Existing Demolition Ordinances?
  - Self Certification?
  - Delegations?
  - Timelines?
  - Coordination With Public Cleanup In Enforcement?

# Abatement

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- Victim, Violator, or Both?
- Ordinary Code Enforcement At Unprecedented Scale
- Warrant Issues
- Outreach



# Next Steps

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- Insurance
- Demands without cost reports?
- Timing?

# Questions?

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