

Guidelines for Potential Soil or Groundwater Contamination at Proposed Project Sites

The presence of soil and or groundwater contamination at or under a proposed development site can have significant consequences on the proposed project. Our goal is to provide you, the developer, with guidance as early in the process as possible so that you can address any potential concerns that arise with minimal delays to your project. Please submit written responses to your Planning Department representative. Note that these are general guidelines and do not address every situation.

If you have questions regarding these guidelines please contact the Acting Fire Marshal Gordon Simpkinson at (650) 329-2347 or at Gordon.Simpkinson@cityofpaloalto.org.

I Is there Soil or Groundwater Contamination?

1. Is there soil contamination on the site?
 - a. A Phase I investigation including a site inspection and review of public agency files is often adequate to determine if soil contamination is a concern. If the results of a Phase I investigation are positive, a Phase II investigation may be necessary which includes the collection and analysis of soil samples from the property. Your environmental consultant can advise you on the need for a Phase I or Phase II investigation.
 - b. If soil contamination is found or suspected additional work may be required as outlined below.
2. Is there groundwater contamination under or near the property?
 - a. A Phase I investigation may be adequate to make this determination as this information should be available from
 - The San Francisco Regional Water Quality Control Board (RWQCB), 1515 Clay Street, Oakland, CA. (510) 622-2300,
 - The State Water Resources Control Board's Geotracker web site at <http://geotracker.swrcb.ca.gov/> and,
 - The Department of Toxic Substances Control (DTSC) web site at <http://www.dtsc.ca.gov/database/Calsites/Index.cfm>.
 - b. If groundwater contamination is found or suspected additional work may be required as outlined below.
3. If there is no soil or groundwater contamination under or near the property submit written confirmation to your Planning Department representative. A copy of the consultant's report satisfies this requirement.

II Soil Contamination

4. If soil contamination is confirmed, submit a plan that includes the following at a minimum. In most cases you will need the services of a qualified professional to develop and execute the plan.
 - a. Proposed method to determine the scope of contamination
 - b. Removal of contaminated soil
 - c. Disposal method
 - d. Sampling plan to confirm all contaminated soil has been removed

III Groundwater Contamination

- 5 If there is or are nearby groundwater contamination plume(s) provide confirmation from a qualified professional or the authority having jurisdiction (AHJ) whether the plumes extend under the subject property or if they are likely to migrate under the property. Examples of plumes that are unlikely to migrate under a subject property include plumes that are down or cross-gradient or upgradient plumes that have installed barrier devices such as slurry walls or extraction wells.
- 6 If the groundwater under the property is contaminated, then before proceeding with the proposed project you must provide either:
 - a. Documentation from the AHJ that indicates the following:
 - i. That the contaminant types and concentrations are not a potential threat to site development workers or future users/inhabitants of the site.
 - ii. That the work proposed will not adversely impact the movement of the plume
 - iii. That the work proposed will not adversely impact groundwater cleanup activity or ongoing groundwater monitoring.
 - iv. That a Risk Management Plan is not necessary, or
 - b. Documentation
 - i. From the AHJ identifying the mitigating work necessary for the proposed project to proceed, or their approval of a work plan prepared by a qualified professional,
 - ii. A Risk Management Plan, if required by the AHJ, and
 - iii. A work plan from you prepared by a qualified professional describing the mitigating work. Note: if acceptable to both the AHJ and the City of Palo Alto some work may be conducted concurrently with the project.
- 7 Finally, if the project work will reach groundwater depths then the Palo Alto Regional Water Quality Plant will also want to ensure the groundwater will be disposed properly. You will need to contact them at 650-329-2598.