

Permit Tracking: City of Oakland Institutional Control for Residual Contamination

The City of Oakland permit tracking control relies on three main components: interagency communication, a one-stop shop for City permits, and the hazardous materials expertise of City staff.

Under the City's permit tracking control, the regulatory agencies copy the City of Oakland Fire Department, Hazardous Materials Management Program (HMMP), on all closure letters and accompanying documentation, such as risk management plans. Closure documentation is filed away for future reference in the HMMP library. For sites receiving conditional closure, the HMMP takes the additional step of entering pertinent information into the Permit Tracking System (PTS), an electronic database system that tracks all City permits from filing to issuance and provides the user with a permitting and inspection history. These sites are automatically "flagged" by the PTS to alert permit counter staff, when a permit application is later submitted, that residual contamination exists at the site.

Permit applications for flagged sites are routed to the HMMP for special review if they either involve work that may alter the site conditions upon which regulatory closure was granted or involve work that may otherwise trigger compliance with a risk management plan (RMP). Typical examples would be applications for excavation work or land use changes.

The PTS does not allow for permits under special review to be issued until cleared in the PTS by the HMMP. The HMMP consults its copies of the closure letter and any accompanying documentation prior to making one of three determinations:

- (1) issue the permit; no contamination-related concerns exist;
- (2) issue the permit once the applicant has shown how compliance with the closure letter or RMP will be achieved;
- (3) direct the applicant to contact the regulatory agency that issued the closure letter to obtain approval for the proposed work prior to issuance of the permit.

Figures 1 and 2 present the regulatory and permitting decision-making processes for the permit tracking control in flow chart form.

Figure 1. Interagency Communication and Data Storage Procedures for Sites Granted Regulatory Closure

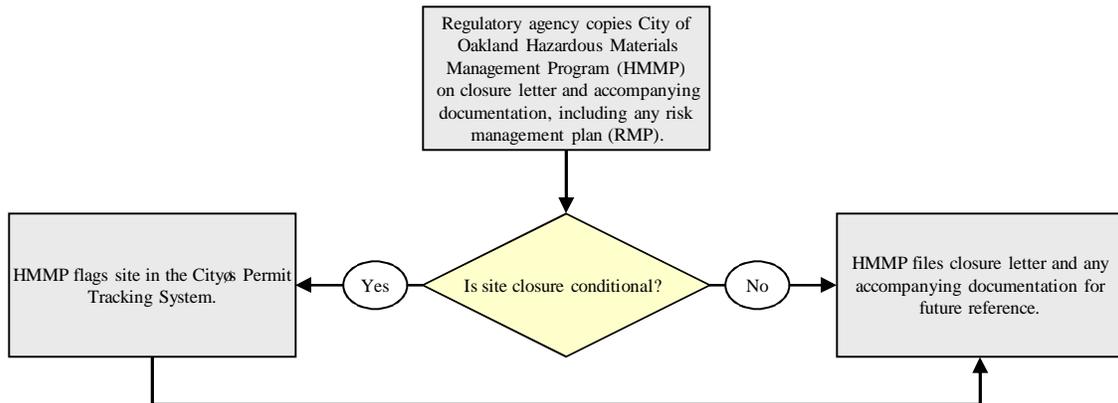


Figure 2. City of Oakland Permitting Process for Sites Granted Conditional Regulatory Closure

