

## A Step by Step Guide To Opt-In or Opt-Out of Shasta County's Consolidated Debris Removal Program Regarding the Carr Fire and Moving forward with Clean-Up Activities

There is a tremendous amount of confusion from homeowners affected by the Carr Fire regarding property cleanup and participating in Shasta County's Consolidated Debris Removal Program or not (this program applies to all homes located within Shasta County regardless of whether the home is located within Redding city limits, etc.). The scope of work for the debris clean-up is essentially identical whether homeowners opt-in or opt-out of the debris removal program – if homeowner's choose to opt-in they are electing to have government agencies perform the scope of work, while homeowner's who choose to opt-out will work with their insurance providers to retain private contractors to perform the scope of work.

**Step 1**: Determine your insurance company's specific coverage available for 'debris removal' from your property. This varies greatly from insurance company to company, but can be a flat % of the total replacement value of your home ranging from roughly 5% and up. Some homeowners have more than enough coverage while others have far too little (a rough estimate on testing, clean-up and disposal is \$20,000 on the low end and \$50,000 on the high end). If you had <u>no</u> insurance on your home, then Guzi-West recommends you "opt-in" to Shasta County's Consolidated Debris Removal Program, as the program will cover costs from testing to debris removal. As explained below, you should be prepared to be patient if you choose to opt-in and allow the government agencies to complete their work.

\* The disadvantage of opting-in is that homeowners can't control the initial testing work, removal of the debris, general control of their property and most importantly time (the government process for doing the required testing, waste removal, and confirmation testing in the end is expected to take several months at minimum). The amount of fires present throughout the state, including the 1,000+ homes destroyed locally, will cause a strain on the availability of qualified contractors to perform the required work which will certainly lead to significant delays. Many insurance companies have already had or lined up the initial required asbestos testing for property owners who are electing to work with their insurances privately. Meanwhile, a prime environmental contractor will still have to be retained by the Program and that contractor will then retain qualified subcontractors to perform the testing and cleanup; that governmental procurement process will likely take a good deal of time, especially given the shortage of qualified contractors. Homeowner's who wish to opt-into the Program will be required to remit the portion of their insurance coverage dedicated for debris removal over to the Program to cover the government's costs.

\* The main advantage for opting-out is that you will maintain control over your property, who accesses it, and likely most importantly the speed in which the work is done.

**Step 2**: Once homeowner's know their respective insurance coverage, they can simply choose to opt-in and simply wait for the work to be completed by the government agencies, or opt-out and choose which contractors work on their homes based upon their availability to complete the work and associated



costs and/or they can simply work directly with their insurance companies to have the required work completed. Our firm is seeing both approaches being employed.

**Step 3**: The protocol specified in the table below is expected to be generally followed regardless of whether the work is done by private or governmental contractors. Additional information on the required work can be found

here: <u>http://www.caloes.ca.gov/RecoverySite/Documents/Cal%20EPA%20Guidance%20for%20Conduct</u> ing%20Emergency%20Debris,%20Waste%20and%20Hazardous%20Material%20Removal%20Actions.pdf

Clean-Up Operations	Clean-Up Protocols
Asbestos Testing	Prior to the removal of hazardous materials and household hazardous wastes
	(HHW) a California Division of Occupational Safety and Health (DOSH)
	Certified Asbestos Consultant (CAC) should assess and sample all residential,
	and other affected areas of the site, to identify and remove gross
	asbestos. This is to ensure that any areas identified as containing gross
	asbestos material will not be disturbed by hazardous materials cleanup
	personnel. Note: Guzi-West has a CAC and two other staff members who
	can perform asbestos surveys.
Work Plan	Demolition, Asbestos Abatement, and Hazardous Material Contractors will
	work with CACs and other personnel to develop a Work Plan that identifies
	site testing and analysis completed, how and what hazardous wastes
	(including asbestos, if present) will be removed along with other fire debris,
	plans submitted for erosion control, soil grading, and ultimately soil
	confirmation sampling once the lot has been cleared to ensure a safe
	condition to be rebuilt upon.
Application Process	The Work Plan will likely be submitted in conjunction with a demolition or
	similar permit application to the County and potentially to the respective City
	Building Department. Once the application is approved, the County/City will
	issue a demolition permit or similar.
Hazardous Waste	Asbestos and other hazardous wastes will be removed from the property.
Removal	Additional information available here for waste disposal
	requirements: https://www.co.shasta.ca.us/docs/libraries/resource-
	management-docs/ehd-docs/wcl-fire-generated-debris-waste-acceptance-
	policy-final-june-2018.pdf?sfvrsn=84cdfb89_2
Debris	Ash and fire debris along with metals and concrete will be removed and
	disposed of and/or recycled where appropriate
Soil Grading	3-6 inches of soil from the impacted area will be removed after the ash and
	debris is removed to a level of visually clean. This soil is expected to be
	placed into plastic lined waste haulage containers and hauled to a landfill
	(most likely West Central Landfill).
Confirmation Sampling	Soil samples will be collected from 0-3 inches of the impacted area (which
	has been cleaned) for confirmation the soil samples are now in compliance
	with clean-up goals established by local environmental agencies, the U.S.
	Army Corps of Engineers, and Cal-Recycle. These clean-up goals don't
	appear to be established yet for our area.



**Summary**: This guide was developed by Guzi-West's Certified Asbestos Consultant (CAC), Clay Guzi, based upon review of information from Shasta County Environmental Health, CA Operation of Emergency Services, CalEPA, DTSC, and FEMA. The information presented herein is believed to be the most accurate information currently available; that said, regulatory agencies are arriving and leaving the Redding area each day/week and there is potential for a given element to change based upon their input and/or a final determination by a local agency. The guide will be updated as new information becomes available.

Guzi-West is a Redding-based asbestos, lead-based paint, mold, and other hazardous material consulting company. This is our community and our firm is dedicated to helping the community recover. As such, our firm has elected to donate 20% of Carr Fire project-related revenue back to the respective families who partially or completely lost their homes. We sincerely hope everyone is beginning to recover from this disaster and that the process runs smoothly for each of you from here regardless of whether our firm works with you or not.

Please feel free to contact me if you have further questions or need additional information.

Sincerely,

Clay Guzi, Steve West, and the Guzi-West team

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