Shaw Environmental, Inc.
4005 Port Chicago Highway
Concord, California 94520-1120
Phone: 925.288.9898
Fax: 925.288.0888

Shaw® Shaw Environmental, Inc.

November 28, 2006

Shaw Project No. 120299.18

Ms. Erin Mustain
Utilities NOI, NPDES Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

Subject: **NPDES Permit No. CAG990002 Renewal**
AT&T Corp.
WDID NO.: 3000U000083

Dear Ms. Mustain:

Shaw Environmental, Inc. (Shaw), on behalf of AT&T Corp., has prepared the attached renewal application for the general NPDES permit for discharges from utility vaults and underground structures to surface waters (NPDES No. CAG990002 and Order No. 2006-0008-DWQ) for your review.

A completed Notice of Intent (NOI) is included in Attachment 1. Five manhole sampling locations within San Luis Obispo and Santa Barbara (Region 3) are summarized in Table 1 and delineated in Figures 3.1 to 3.7. These manholes are to be sampled yearly in accordance with the required Monitoring and Reporting Program. The manhole water is sampled to ensure that water pumped out of the manholes do not exceed discharge water limitations. A copy of the Pollution Prevention Plan is included in Attachment 2.

Please direct any written correspondence to:

Mr. Jay Maille
AT&T Environment, Health & Safety Manager
2600 Camino Ramon Room 3E000
San Ramon, California 94583

If you have any questions, please contact either Mr. Jay Maille at (925) 823-7430 or the undersigned with Shaw at (925) 288-2103. Thank you for your assistance in this matter.

Sincerely,
Shaw Environmental, Inc.

Rob Delnagro
Project Manager

cc: Mr. Jay Maille – AT&T EH&S

O:\AT&T\06-0080.doc

Attachments:
Table 1 – Recommended Manhole Sampling Locations
Figure 3.1 – Site Vicinity Map MH-287+20, MH-7218, and MH-7318
Figure 3.2 – Site Vicinity Map MH-369-4070 and MH-370-3740
Figure 3.3 – MH-287+20
Figure 3.4 – MH-369-4070
Figure 3.5 – MH-370-3740
Figure 3.6 – MH-7218
Figure 3.7 – MH-7318
Attachment 1 – Notice of Intent
Attachment 2 – Pollution Prevention Plan

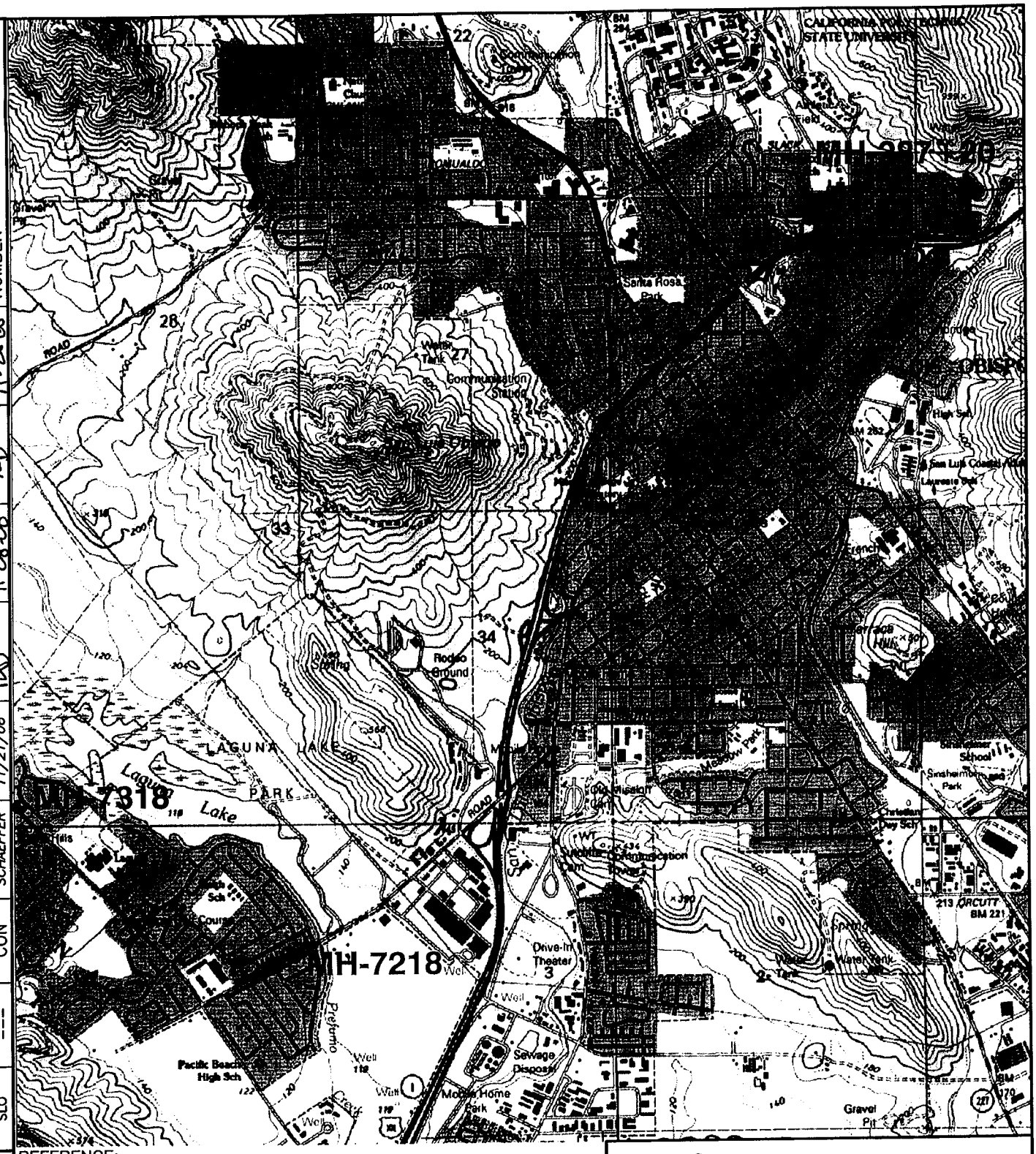
Table

TABLE 1
REGION 3 RECOMMENDED MANHOLE SAMPLING LOCATIONS

City (Regional Board #)	Manhole Address	AT&T Manhole #	City (Regional Board #)	Manhole Address	AT&T Manhole #
San Luis Obispo (3)	Northeast corner of parking lot of Cuesta Canyon Park, at the end of Loomis Street	MH-287+20	Santa Barbara (3)	North side of UPRR tracks and West Castillo Street	MH-369-4070
San Luis Obispo (3)	North side of Madonna Road, west of Boranda Street	MH-7218	Santa Barbara (3)	North side of UPRR tracks and southeast corner of Chapala Street	MH-370-3740
San Luis Obispo (3)	South side of Los Osos Valley Road, west of Diablo Drive	MH-7318			

Figures

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
SLO	---	CON	SCHAEFFER	11/21/06	MD	11-25-06	AD	11-25-06	120299-A117



REFERENCE:
7.5' USGS TOPOGRAPHIC QUADRANGLE OF "SANTA BARBARA, CA"; DATED 1995

SAN LUIS OBISPO MANHOLE LOCATION

SCALE
0 2400 4800 FEET

Shaw® Shaw Environmental, Inc.

AT&T CORP.

FIGURE 3.1

SITE VICINITY MAP
MH-287+20, MH-7318,
AND MH-7218

DRAWING NUMBER	APPROVED BY	CHECKED BY	DRAWN BY	OFFICE	X-REF	IMAGE
120299-A116	11-28-06	11-28-06	11/21/06	CON	---	SANTA B
	MD	MD	SCHAEFFER			

REFERENCE:
7.5' USGS TOPOGRAPHIC QUADRANGLE OF "SANTA BARBARA, CA"; DATED 1995

SANTA BARBARA MANHOLE LOCATION

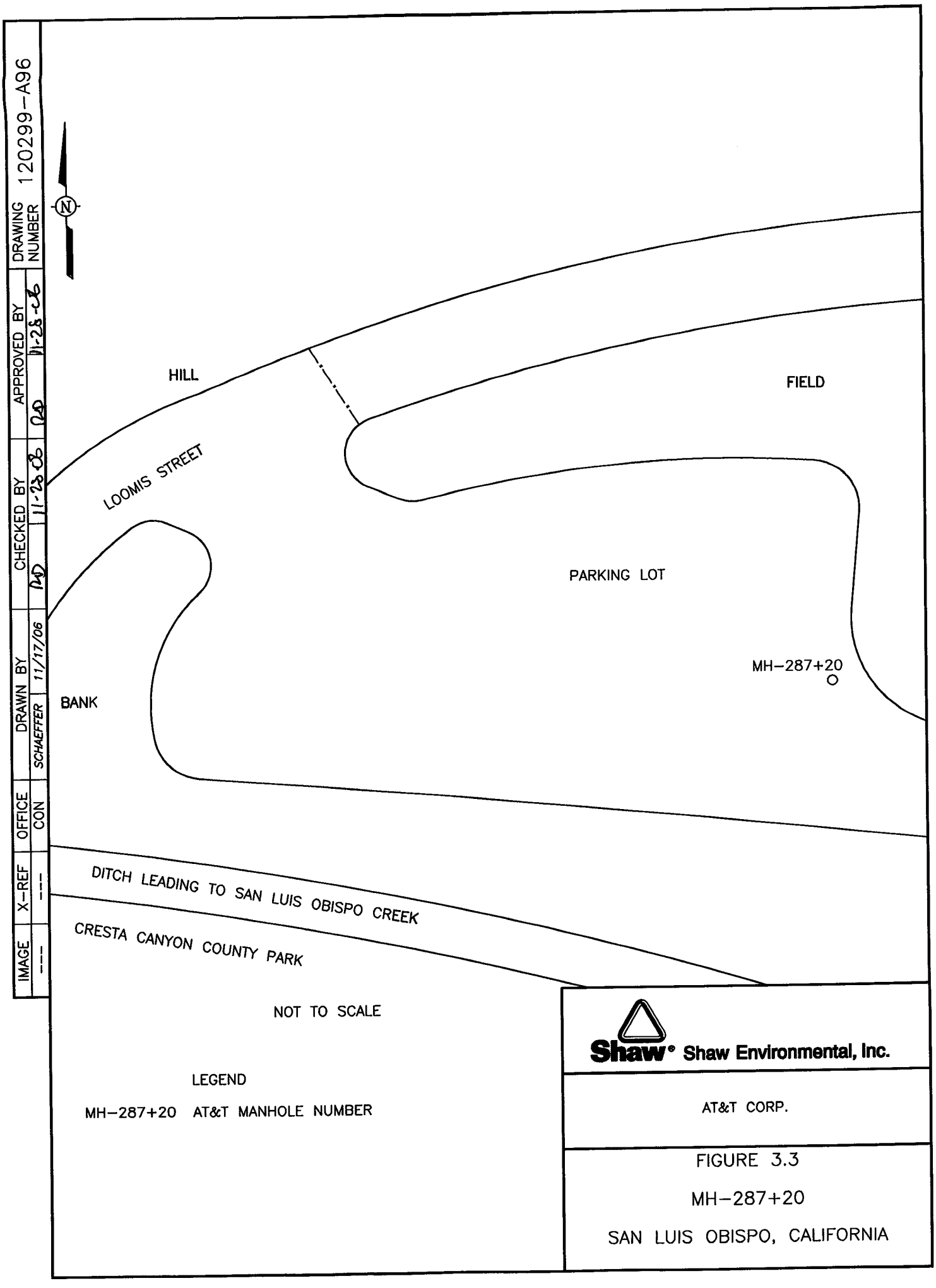
SCALE
0 2000 4000 FEET

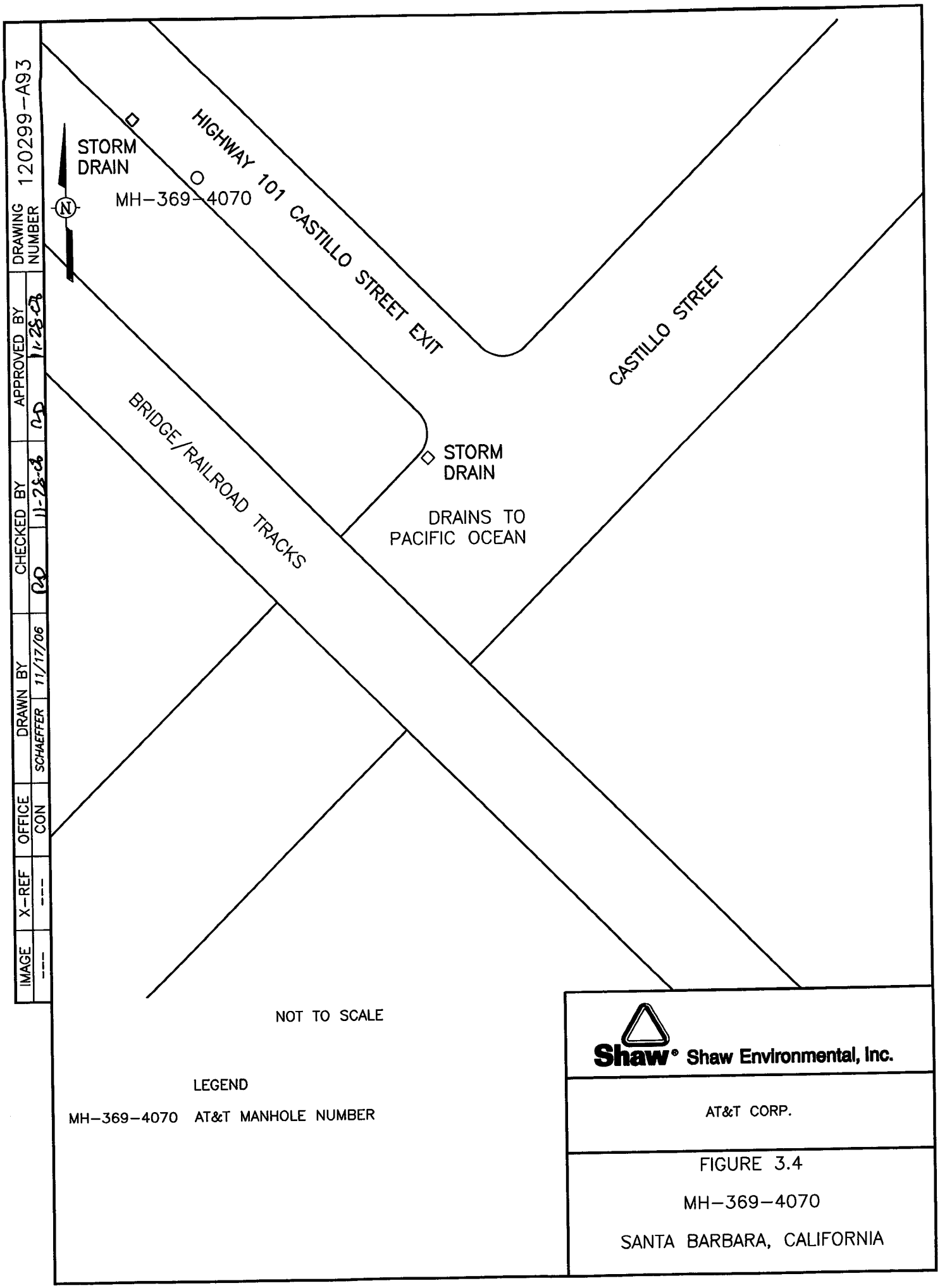
Shaw® Shaw Environmental, Inc.

AT&T CORP.

FIGURE 3.2

SITE VICINITY MAP
MH-369-4070 AND MH-370-3740


DRAWING NUMBER 120299-A96
APPROVED BY 11-28-06
CHECKED BY 11-28-06
DRAWN BY SCHAEFFER 11/17/06
OFFICE CON
X-REF ---
IMAGE ---
N
HILL
FIELD
LOOMIS STREET
PARKING LOT
MH-287+20
BANK
DITCH LEADING TO SAN LUIS OBISPO CREEK
CRESTA CANYON COUNTY PARK
NOT TO SCALE
LEGEND
MH-287+20 AT&T MANHOLE NUMBER
Shaw Shaw Environmental, Inc.
AT&T CORP.
FIGURE 3.3
MH-287+20
SAN LUIS OBISPO, CALIFORNIA



Shaw® Shaw Environmental, Inc.

AT&T CORP.

FIGURE 3.4

MH-369-4070

SANTA BARBARA, CALIFORNIA

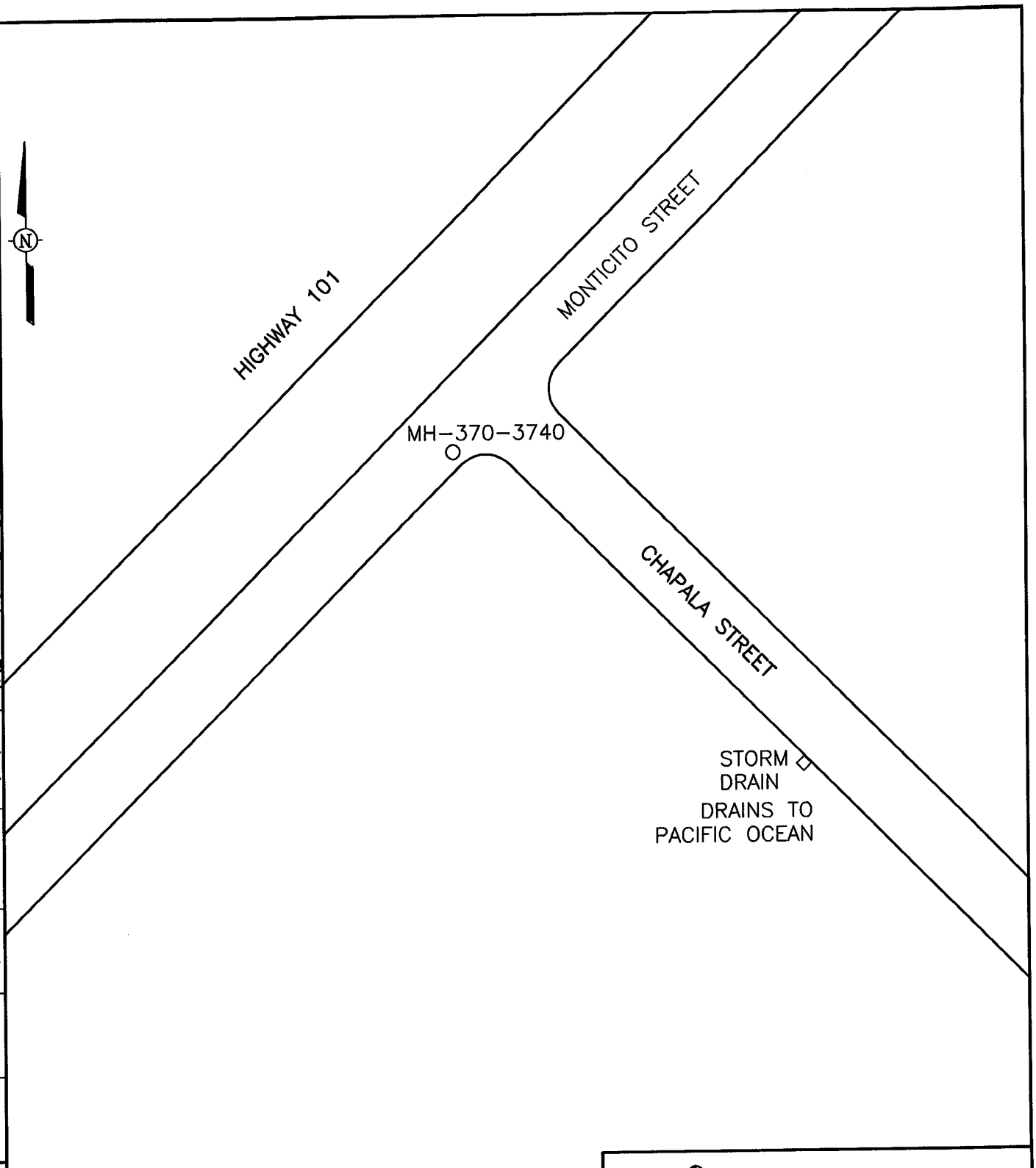


IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	---	CON	SCHAEFFER	11/17/06	DO	11-28-06	DO	11-28-06	120299-A92

NOT TO SCALE

LEGEND

MH-370-3740 AT&T MANHOLE NUMBER

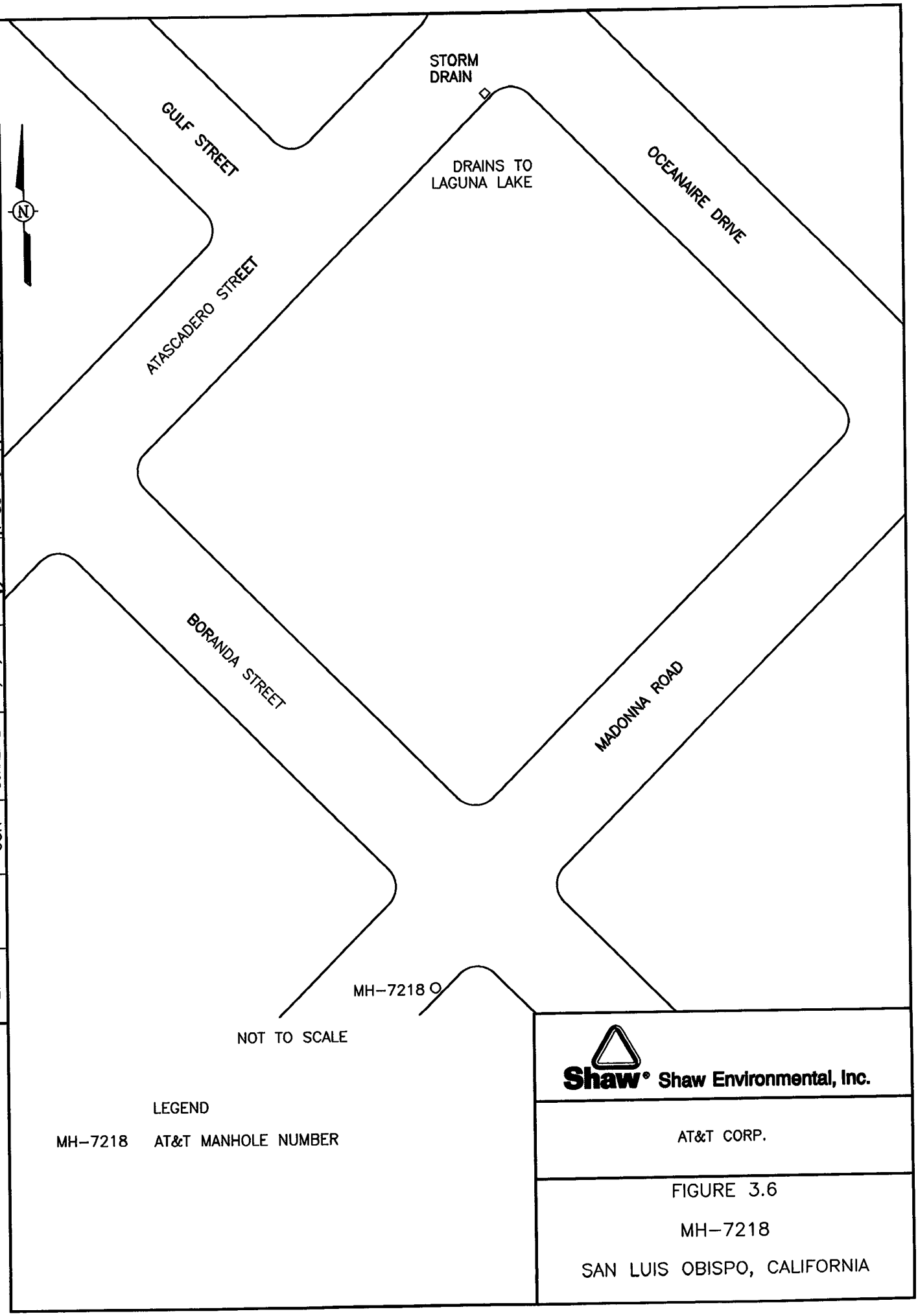
Shaw® Shaw Environmental, Inc.

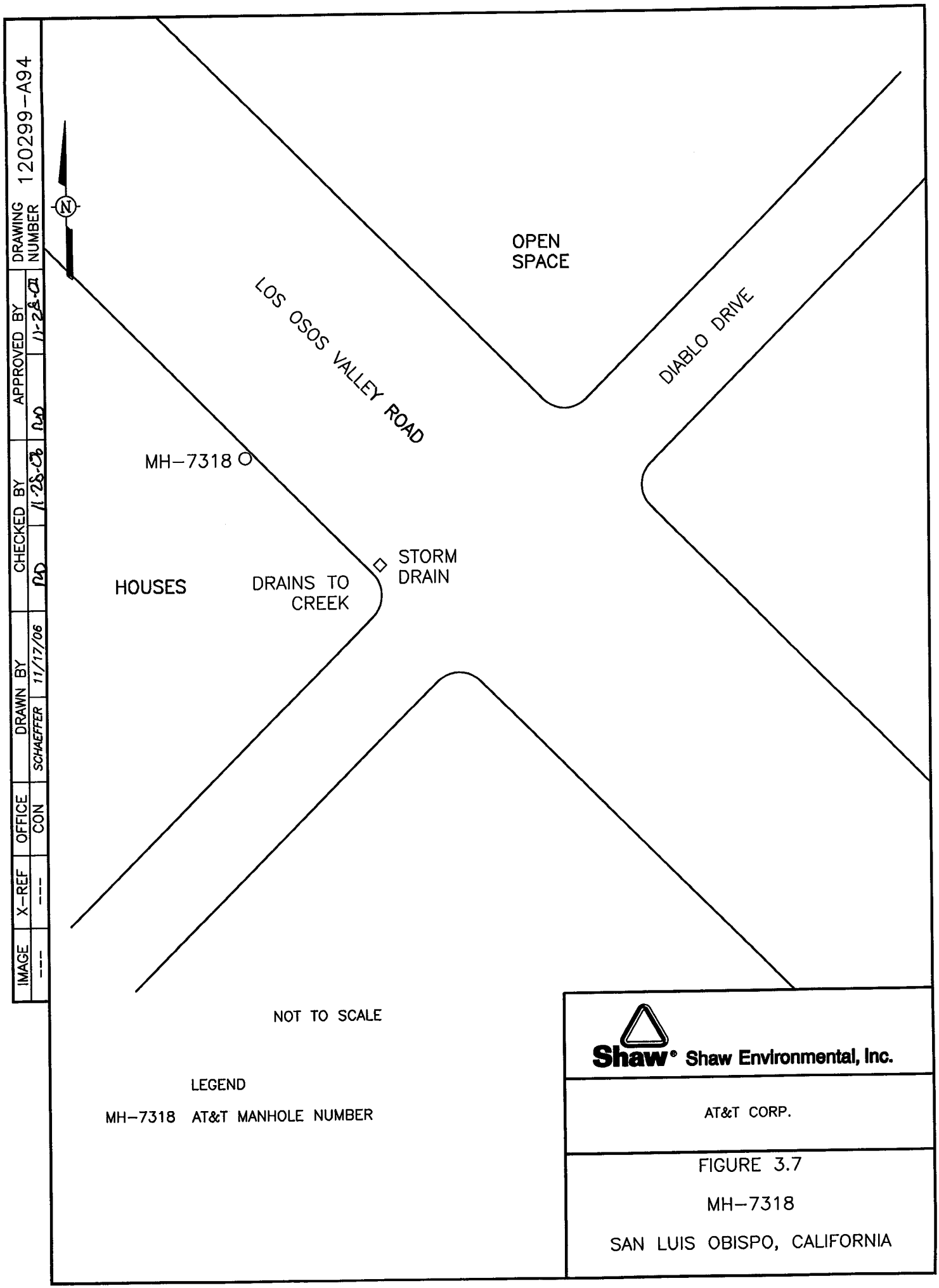
AT&T CORP.

FIGURE 3.5

MH-370-3740

SANTA BARBARA, CALIFORNIA


STORM DRAIN
GULF STREET
DRAINS TO LAGUNA LAKE
OCEANAIRE DRIVE
ATASCADERO STREET
BORANDA STREET
MADONNA ROAD
MH-7218
NOT TO SCALE
LEGEND
MH-7218 AT&T MANHOLE NUMBER
DRAWING NUMBER 120299-A95
APPROVED BY
CHECKED BY
DRAWN BY SCHAEFFER 11/17/06
OFFICE CON
X-REF ---
IMAGE ---
Shaw® Shaw Environmental, Inc.
AT&T CORP.
FIGURE 3.6
MH-7218
SAN LUIS OBISPO, CALIFORNIA


OPEN SPACE
LOS OSOS VALLEY ROAD
DIABLO DRIVE
MH-7318
STORM DRAIN
HOUSES
DRAINS TO CREEK
N
NOT TO SCALE
LEGEND
MH-7318 AT&T MANHOLE NUMBER
IMAGE
X-REF
OFFICE
CON
DRAWN BY
SCHAEFFER
11/17/06
CHECKED BY
APPROVED BY
DRAWING NUMBER
120299-A94
Shaw® Shaw Environmental, Inc.
AT&T CORP.
FIGURE 3.7
MH-7318
SAN LUIS OBISPO, CALIFORNIA

Attachment 1
Notice of Intent

ATTACHMENT B – NOTICE OF INTENT FORM

NOTICE OF INTENT (NOI)
WATER QUALITY ORDER NO. 2006-0008-DWQ
STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND STRUCTURES TO SURFACE WATERS OF THE UNITED STATES
GENERAL PERMIT NO. CAG990002

I. NOTICE OF INTENT STATUS (See Instructions)

MARK ONLY ONE ITEM	1.☐ New Discharger	2.☒ Change of Information – WDID # 3000U000083

II. OWNER/OPERATOR *(If additional owners/operators are involved, provide the information in a supplemental page.)*

A. Name: AT+T Corp.		Owner/Operator Type (Check One): 1.☐ City 2.☐ County 3.☐ State 4.☐ Gov. Combo 5.☒ Private	
B. Mailing Address: 2600 Camino Ramon; Room 3E000			
C. City: San Ramon	D. County: Contra Costa	E. State: CA	F. Zip Code: 94583
G. Contact Person: Jay Maille	H. Title: Environmental Manager	I. Phone: 925 823 7430	

☐ **ADDITIONAL OWNERS** _____

III. BILLING ADDRESS *(Enter information only if different from above)*

Send to: ☐ **Owner/Operator** ☐ **Other**	A. Name	B. Title	
	C. Mailing Address		
D. City	E. County	F. State	G. Zip Code

IV. RECEIVING WATER INFORMATION

A. Receiving water(s): Effluent discharge to drain or land	B. Describe the types of receiving waters affected: Streams, Rivers, Bays, and Ocean
C. Regional Water Quality Control Board(s) where discharge sites are located List all regions where discharge of wastewater is proposed, i.e. Region(s) 1, 2, (3) 4, 5, 6, 7, 8, and/or 9:	

V. LAND DISPOSAL/RECLAMATION

The State Water Resources Control Board's water rights authority encourages the disposal of wastewater on land or re-use of wastewater where practical. You must evaluate and rule out this alternative prior to any discharge to surface water under this Order.

Is land disposal/reclamation feasible? ☐ **Yes** ☒ **No**

If **Yes**, you should contact the Regional Water Board. This Order does not apply if there is no discharge to surface waters. If **No**, explain: majority of manholes are in urban areas, where discharge to land or re-use is not feasible

VI. VERIFICATION

Have you contacted the appropriate Regional Water Board or verified in the appropriate Basin Plan that the proposed discharge will not violate prohibitions or orders of that Regional Water Board? ☒ **Yes** ☐ **No**

VII. TYPE (Check All That Apply)

☐ Electric ☐ Natural Gas ☒ Telephone ☐ Other:

VIII. POLLUTION PREVENTION PRACTICES PLAN INFORMATION

A. Company Name: AT+T Corp.			B. Contact Person: Jay Mailie	
C. Street Address Where PLAN is Located: 2600 Camino Ramon; Room 3E000			D. Title of Contact Person: Environmental Manager	
E. City: San Ramon	F. County: Contra Costa	G. State: CA	H. Zip Code: 94583	I. Phone: 925 823 7430

IX. DESCRIPTION OF DISCHARGE

Describe the discharge(s) proposed. List any potential pollutants in the discharge. Attach additional sheets if needed.

Discharge will be from vaults which pass the manhole bailer test and other requirements outlined in the PLAN. Water will be pumped to the street gutter. Water may contain total suspended and total dissolved solids and minor concentrations of petroleum hydrocarbons from run-off from road.

X. VICINITY MAP AND FEE

A. Have you included vicinity map(s) with this submittal? Separate vicinity maps must be submitted for each Region where a proposed discharge will occur.	☒ Yes	☐ No	
B. Have you included payment of the filing fee (for first-time enrollees only) with this submittal?	☐ Yes	☐ No	☒ N/A
C. Have you included your PLAN?	☒ Yes	☐ No	

XI. CERTIFICATION

" I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is true, accurate, and complete to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. In addition, I certify that the provisions of the permit, including the criteria for eligibility and the development and implementation of Pollution Prevention Practices, if required, will be complied with."

A. Printed Name: MICHELE BLAZEVIC	
B. Signature: Michele M Blazevic	C. Date: 11/16/06
D. Title: DIRECTOR — ENV'TAL HEALTH & SAFETY	

PLEASE SUBMIT THE NOI, FIRST ANNUAL FEE, PLAN AND MAP TO THE FOLLOWING ADDRESS:

UTILITIES NOI
NPDES UNIT
DIVISION OF WATER QUALITY
STATE WATER RESOURCES CONTROL BOARD
P.O. BOX 100
SACRAMENTO, CA 95812-0100

STATE USE ONLY

WDID:	**Regional Board Office**	**Date NOI Received:**	**Date NOI Processed:**
		Fee Amount Received: $	**Check #:**

Attachment 2
Pollution Prevention Plan

AT&T Corp.

POLLUTION PREVENTION PLAN (PPP) FOR WATER DISCHARGES FROM UNDERGROUND STRUCTURES

(NPDES General Permit CAG990002)
(Order No. 2006-0008-DWQ)

Prepared by:
AT&T Environment, Health & Safety
Environmental Management
Jay P. Maille
2600 Camino Ramon
San Ramon, California 94583

November 16, 2006

TABLE OF CONTENTS

LIST OF FIGURES ii
LIST OF APPENDICES ii

1.0 INTRODUCTION 1
- 1.1 Overview 1
- 1.2 Purpose of the Plan 1
- 1.3 Updating of the Plan 2
- 1.4 Pollution Prevention Team 2

2.0 TYPES OF DISCHARGES 2
- 2.1 Manual Discharges 2
- 2.2 Automatic Discharges 3

3.0 DISCHARGE SCHEDULE 3
- 3.1 Unscheduled Discharges 3
- 3.2 Scheduled Discharges 4
- 3.3 Emergency Discharges 4
- 3.4 Spills and Leaks 4

4.0 POLLUTION PREVENTION PRACTICES (PPP) 5
- 4.1 Overview 5
- 4.2 When to Apply 5
- 4.3 Procedures of Water Discharge from Wet Structures 5
  - 4.3.1 Testing Procedures 6
  - 4.3.2 Engineering Controls 7
- 4.4 Manhole Water Disposal 8
  - 4.4.1 Water Passes the Testing Procedures 8
  - 4.4.2 Water Fails the Testing Procedures 8
- 4.5 Procedures of Water Discharge from Dry Vaults and Structures 8
- 4.6 Inspections and Maintenance Activities 9
- 4.7 Employee Training 9
- 4.8 Sediment and Erosion Control 9
- 4.9 Comprehensive Site Compliance Evaluation 10

5.0 CERTIFICATION AND SIGNATURE 10

6.0 CONTACT INFORMATION 10

LIST OF FIGURES

Figure	Title
1	North Coast Region 1 Vicinity Map
2	San Francisco Bay Region 2 Vicinity Map
3	Central Coast Region 3 Vicinity Map
4	Los Angeles Region 4 Vicinity Map
5	Central Valley Region 5 Vicinity Map
6	Lahontan Region 6 Vicinity Map
7	Colorado River Basin Region 7 Vicinity Map
8	Santa Ana Region 8 Vicinity Map
9	San Diego Region 9 Vicinity Map

LIST OF APPENDICES

Appendix	Title
A	Flow Charts: "Utility Manhole & Vault De-Watering Decision Guide"

1.0 INTRODUCTION

1.1 Overview

The California State Water Resources Control Board has authority under the Federal Clean Water Act of 1972, to issue statewide General National Pollutant Discharge Elimination System (NPDES) Permits to regulate the discharge of pollutants into United States waters.

For Pacific Bell Telephone Company (dba AT&T California and herein referred to as AT&T), discharges are a routine activity of telecommunications network operations and maintenance. AT&T may occasionally remove water from manholes, utility vaults and other underground structures as a result of stormwater inflow from the surface, subterranean seepage, and/or irrigation runoff.

To facilitate regulation of discharges from the de-watering of the utility vaults and similar underground structures, the State Board has developed a *National Pollutant Discharge Elimination System (NPDES) Permit for Discharges from Utility Vaults and Underground Structures to Surface Waters (General Permit CAG990002).* The State Board allows utilities to apply for coverage under the General Permit with each Regional Water Quality Control Board (Regional Board) in which they have discharges to surface waters.

The Permit requires utilities to develop and implement a Pollution Prevention Plan (Plan) which includes Pollution Prevention Practices (PPP) designed to prevent or control the discharge of pollutants. The General Permit also requires utilities to develop and implement an annual monitoring program to analyze discharges from a representative number of utility vaults and to submit this report to the appropriate Regional Board.

This Plan explains AT&T's operational procedures for discharging water from manholes, utility vaults and other underground structures to comply with water quality standards and the provisions of the General Permit.

1.2 Purpose of the Plan

This Plan has been prepared in accordance with the NPDES Permit for Discharges by Utility Companies to Surface Waters (NPDES No. CAG990002 and Order No. 2006-0008-DWQ) and applies to short-term intermittent discharges to surface waters by AT&T. The purpose of this Plan is to describe:

- The type and duration of discharges that occur;
- The operating procedures to ensure that pollutant concentrations in the discharge do not violate water quality objectives for the receiving waters, including prohibitions to discharge; and

- The commitment of AT&T to continued evaluation of measures to reduce pollutants in discharges and to prevent, to the extent practicable, cross-media pollution.

1.3 Updating of the Plan

AT&T must amend the Plan whenever there is a change in construction, operation, or maintenance, or to ensure compliance with water quality standards. In addition, the Plan must be amended if it violates any condition of the Permit or has not achieved the general objective of controlling pollutants in discharges to surface waters.

1.4 Pollution Prevention Team

The Pollution Prevention Team (PPT) is headed by AT&T Environment, Health & Safety Manager Mr. Jay Maille and includes all AT&T service technicians working with underground structures. Members of the PPT are responsible for developing the Plan and assisting in its implementation, maintenance, and revision.

2.0 Types of Discharges and Potential Pollutants Sources

AT&T discharges covered by this Plan all originate as water accumulated in underground utility service structures. These discharges can be divided into two types, manual or automatic, according to how the water is discharged. The following describes the two types of discharges, as well as potential pollutant sources associated with each type of discharge. Essential features of the drainage systems in each of the nine Regional Water Quality Boards are depicted in Figures 1 through 9.

2.1 Manual Discharges

Manual discharges originate in potentially wet structures including manholes, vaults, and similar underground structures that contain signal repeating equipment, communication cables, cable connections and/or other telecommunication equipment. These spaces are subject to intrusion of infiltrated groundwater and surface runoff from above, as well as potentially from leaks in other underground utility service lines (e.g. storm drains and sanitary drain lines).

Normal company operations in a wet underground structure do not directly contribute to the generation of contaminants in water. Since these structures are not constructed to be water tight, occasionally foreign liquids may infiltrate the structure typically as a result of rising water tables, surface runoff, or a broken public sanitary sewer pipe. Water that is trapped in the wet structure may have occasional traces of sewage, oil, grease, petroleum, organic matter, mud, silt, pesticides, and other pollutants (potentially metals) in small amounts usually resulting from surface runoff or auto exhaust.

2.2 Automatic Discharges

Automatic discharges occur from dry structures referred to as controlled environmental vaults (CEVs). These structures typically contain switchgear, computers and electronics which are sensitive to heat and moisture.

Unlike wet structures, the construction of CEVs is designed to preclude water intrusion. The vaults are equipped with air conditioners to control equipment temperature and humidity. In addition, CEVs located below ground have automatic sump pumps. Air conditioning water condensate that accumulates in the sump is automatically discharged when a pre-set level is reached. The condensate water discharged never comes in contact with any of the equipment inside the CEVs. Water discharged from dry structures is in smaller quantities than discharges from wet structures.

Heat and moisture alarms are remotely monitored at AT&T's Network Operating Centers (NOCs). In the event of an alarm, a technician is dispatched to investigate and perform any necessary repairs.

3.0 DISCHARGE SCHEDULE

3.1 Unscheduled Discharges

Unscheduled manual and automatic discharges can be controlled utilizing the methods described under section 4.3 and 4.5 of this Plan.

The majority of manual water discharges from wet structures are unscheduled because the water that has accumulated in the underground structure remains there until field technicians enter to do repair or maintenance work. Before work can proceed the field technicians must remove the water. Because of the critical nature of the telecommunications network, service needs to be restored promptly.

Prior to discharging manhole water, field technicians must use on-site water testing procedures to determine if the water can be discharged. Only water that passes the on-site water testing will be discharged. Procedural controls to test and observe the water will be completed prior to and during dewatering activities.

The quantity of water discharged is dependent on the size of the structure and the depth of the water collected in the structure. Typically, manhole water discharge events range from 20 gallons to 2,000 gallons. The discharge is a short term event, lasting approximately 30-90 minutes. Unscheduled discharges from dry structures (CEVs) are

smaller in volume than wet structure discharges. Dry structure discharges are intermittent and result from minor groundwater infiltration and air conditioning condensate.

The water from dry and wet structures is discharged to an area where it may flow to a storm drain system or catch basin. It is possible that the discharge will reach a natural conveyance or water body.

3.2 Scheduled Discharges

AT&T does not practice scheduled discharges. However, such discharges would be controlled utilizing the same methods described under 4.3 and 4.5 of this Plan.

3.3 Emergency Discharges

Emergency discharges from wet or dry structures can be controlled by the same methods described under 4.3 and 4.5 of this Plan.

In emergency situations involving an imminent threat to human life, serious property damage and/or in cases of natural disaster or catastrophic events, field supervisors have the authority to take whatever action is necessary to mitigate the immediate threat including the discharge of untested water.

3.4 Spills and Leaks

During the three years prior to the October 2006 revision of the Plan, there were no spills or leaks of hazardous pollutants from an underground structure or during the decontamination/dewatering of an underground structure maintained by AT&T.

AT&T field technicians are properly trained and equipped with materials needed to immediately deal with a spill or leak of hazardous pollutants. If the leak or spill is of significant size, AT&T would engage one of our emergency response vendors.

AT&T field technicians must call their supervisor, the EHS Hotline at (800) 566-9347 to report a spill or leak of hazardous pollutants. Additionally, spills shall be reported to the appropriate local agency, such as the fire department, to assist in cleanup at their discretion. A spill containing oil of reportable quantity must be reported to the National Response Center at (800) 424-8802 within 24 hours.

The Plan will be updated to include a record of any spills or leaks of hazardous pollutants.

4.0 POLLUTION PREVENTION PRACTICES (PPP)

4.1 Overview

The operating procedures used for on-site testing of water in underground structures must be simple and concise to permit workers to quickly determine if the water can be pumped from the structure so work can resume. The critical nature of telephone communication emergencies requires field technicians to work within tight deadlines. Screening procedures must be compatible with these business needs.

The field technicians are instructed to contact their supervisor and/or the EHS organization for immediate assistance when water fails screening. Depending on the nature of the issue, there are several prearranged licensed contractors available to handle the situation as appropriate. Only water that has passed the screening will be discharged.

It is the responsibility of the field technician to ensure strict adherence to these procedures. This will aid in AT&T's compliance with the provisions of the General Permit.

4.2 When to Apply

The PPP is to be used for the short-term, intermittent discharge of water from manholes, vaults, and other underground structures which must be drained to allow for repair and maintenance work to proceed. Structures will be dewatered only to the point required to allow for safe access to the equipment.

Also, the PPP addresses the control of pollutants discharged from automatically pumped sumps in vaults and other sub surface structures that are to be kept free of moisture and water.

4.3 Procedures of Water Discharge from Wet Structures

This section describes the method for the testing of water prior to discharging the water from a manhole. The purpose of these procedures is to assist the field technician in identifying the quality of the water to be pumped from the underground structure, as well as in identification of any material that may disallow such discharge of the water.

The *manhole water test bailer kit* is designed to allow the field technician to obtain samples and assess the quality of the water in a structure. All observations using the manhole water bailer test kit must be performed outside the manhole.

Testing procedures discussed in this Plan are graphically summarized in the "Utility Manhole & Vault De-Watering Decision Guide". These flowcharts (Appendix A) are a companion document to this Plan and should be read in conjunction to reading this text.

4.3.1 Testing Procedures

Prior to beginning work operations in a vault or manhole, the Field Technician must use applicable worksite procedures to assure the general work area is safe, clearly marked, and that all appropriate personal safety equipment is employed. In addition, established procedures must be followed to assure the confined-space atmosphere is tested prior to entry to perform any work. After this is completed, the following procedures detail the steps that are taken to ensure compliance with the General Permit.

1. Lower the clean water bailer into the deepest part of the manhole to obtain a sample. Slowly raise the water bailer to keep from agitating or spilling any sample.

2. Bring the filled bailer out of the manhole for inspection. Observe the appearance and smell of the water in the bailer. Look carefully for any layered separations of the sample. *A distinct bottom layer may be indicative of dry cleaning fluids or other solvents.* After observational analysis, return the sample to the manhole and refer to Flow Chart #1 to determine the course of action to be taken.

3. Lower the bailer again into the manhole and obtain a surface sample. Slowly raise the water bailer to keep from agitating or spilling any contents. *A distinct top layer may indicate gasoline, oil, or other lighter than water solvents, or possible other organic materials.* After observational analysis, test and verify that the water is within a pH range of 6.0 – 9.0 s.u. then return the sample to the manhole and refer to Flow Chart #1 to determine the course of action.

4. If the manhole water is clear but has a strong chemical odor, a company approved contractor must be used to evacuate the manhole or vault.

5. If the manhole water has free-phase floating hydrocarbon or chemical solvent in any amount greater than a *slight surface sheen*, a company approved contractor must be used to evacuate the manhole or vault.

6. If the manhole water is clear after the previous tests, with no odors, layers, or solids, and the pH is tested and verified to be between 6.0 – 9.0 s.u., the water may be safely discharged. Pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach.

7. If the manhole sample is not clear (transparent) and is instead cloudy, milky and/or dark in color, the sample should be set aside for five minutes to allow settling of any particulate matter to occur. Refer to Flow Chart #1B and to Section 4.3.2 of this Plan. If

the sample remains cloudy or opaque after five minutes, a company approved contractor must be used to evacuate the manhole or vault.

8. The field technician will log observations and test results in a company provided log book.

4.3.2 Engineering Controls

These additional engineering controls shall be applied as follows:

1. Slight Surface Sheen or Floating Solids Present - If a *slight surface sheen* or any floating solids are encountered in the manhole (see Flow Chart #1A), remove any floating solids using a scoop or net and apply an absorbent pillow to the water surface to remove any sheen, if necessary. After completing solids and sheen removal, and if pH is tested and verified between the range of 6.0 – 9.0 s.u., discharge is allowed but pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach. The manhole effluent will be limited to the minimum amount required to access the structure and equipment safely.

2. Bottom Layer Present – Mud and/or Organic Debris – If a bottom layer is encountered and identified as mud or sediments by using Flow Chart #1A, and if pH is tested and verified between the range of 6.0 – 9.0 s.u., discharge is allowed but pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach. The manhole effluent will be limited to the minimum amount required to access the structure and equipment safely.

3. Initially Cloudy Water – Becomes Clear with Time – If the bailer sample is not clear and appears cloudy, milky and/or dark in color, the sample should be set aside for five minutes to allow settling of any particulate matter to occur (Refer to Flow Chart #1B). If the particulate matter settles and the sample clears, and after a pH test verifies a range within 6.0 – 9.0 s.u., discharge is allowed but pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the

curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach. The manhole effluent will be limited to the minimum amount required to access the structure and equipment safely.

4. Periodically the field technician shall inspect the effluent during discharge to ensure the quality of the water being released remains consistent with the sampling observations. If at any time the discharge water quality changes, immediately stop pumping and re-evaluate by testing again.

5. The field technician will log observations and test results in a company provided log book.

4.4 Manhole Water Disposal

4.4.1 Water Passes the Testing Procedures

After passing all aspects of the screening process, the water may be discharged. Whenever possible, the water should be pumped to a storm drain system or catch basin. AT&T field technicians shall never discharge directly into a stream, pond, wetland, swamp, or beach. Engineering controls may be required prior to and/or during dewatering activities. Refer to Flow Chart #1A, Flow Chart #1B, and Section 4.3.2.

4.4.2 Water Fails the Testing Procedures

If manhole water is determined to be of a quality that cannot be discharged (e.g. oily sludge, gasoline or other hydrocarbons greater than a simple sheen, milky or cloudy liquid, strong chemical odor, etc.) a company approved contractor must be obtained to evacuate the structure and to clean it prior to entry and commencing work. In these cases, notify your Supervisor and contact EHS at 800 KNOW EHS (800.566.9347) to obtain a qualified contractor.

If raw sewage is determined to be the material or waste in the manhole, a local septic tank pumping and cleaning company may be used to evacuate and clean the manhole. If the source of sewage is found to be a break in a local sanitary waste line, inform your Supervisor and Environmental Management for reporting to the local agency for repair.

4.5 Procedures of Water Discharge from Dry Vaults and Structures

These procedures apply to any underground structure with an automatic or manually activated sump pump that discharges water to storm drains or surfaces.

To prevent pollution in discharges from dry structures (CEVs), it is essential that the structures are kept clean and that inspections are made. The following are guidelines for maintaining CEVs and other dry structures:

- Do not dispose of any material (e.g. oil, trash, etc.) except condensate water in the sump.
- Keep the vault clean by removing any trash or debris.
- Do not store any chemicals in the vault.
- Immediately clean up any substances spilled on the vault floor to prevent sump contamination.
- Inspect the sump area for debris or signs of staining.

4.6 *Inspections and Maintenance Activities*

When working in underground structures, AT&T field technicians must inspect integrity of the structure to assure that it is functioning properly. Inspection records include the date and time the inspection was performed, the name of the inspector, the items inspected, and any corrective action required

4.7 *Employee Training*

The training of AT&T field technicians in the PPP for any required servicing of the manhole is one of the most effective ways of preventing pollutants in discharged water. Before working in underground structures, AT&T field technicians are properly trained to understand the importance of maintaining high-quality water in the State of California and to comply with the NPDES Permit and the PPP.

4.8 *Sediment and Erosion Control*

Pumping should be performed from the top to the bottom to minimize disturbance of sediments. Every effort should be made to keep the pump inlet nozzle greater than three inches above the surface of any sediment that might have collected in the manhole. The manhole effluent will be limited to the minimum amount required to safely access the manhole equipment. The manhole should not be completely dewatered.

If sediment must be removed from the manhole, the sediment will be assumed to be hazardous. The AT&T field technician will contact his or her Supervisor and/or the EHS staff who will assist in the proper classification of the material and coordinate appropriate transportation and disposal.

When discharging water from underground structures to a storm drain system or catch basin, AT&T field technicians should always make certain that the area is clean. Trash and debris in the vicinity shall be picked up and properly disposed. If sediment exists

around the storm drains, AT&T service technicians shall sweep the area to ensure that excessive sediment does not enter the storm drain system.

If there is no storm drain in close proximity, AT&T service technicians may discharge water from underground structures to the surrounding area. If discharging to unpaved surfaces with significant slopes, fiber rolls or other appropriate devices will be used to minimize erosion.

4.9 Comprehensive Site Compliance Evaluation

A comprehensive site compliance evaluation (CSCE) will be conducted by AT&T field technicians upon each discharge event. The CSCE will include the scope of the evaluation, the personnel making the evaluation, the date(s) of the evaluation, major observations relating the implementation of the Plan, actions taken to revise the Plan, and incidents of noncompliance or a certification of compliance the Plan and the NPDES Permit. The CSCE shall be signed in accordance with the signatory requirements of the NPDES Permit and retained for 3 years by AT&T Environment, Health & Safety.

5.0 CERTIFICATION AND SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: Michele M Blazek
Michele M. Blazek
Title: Director EH&S

Date: 11/16/06

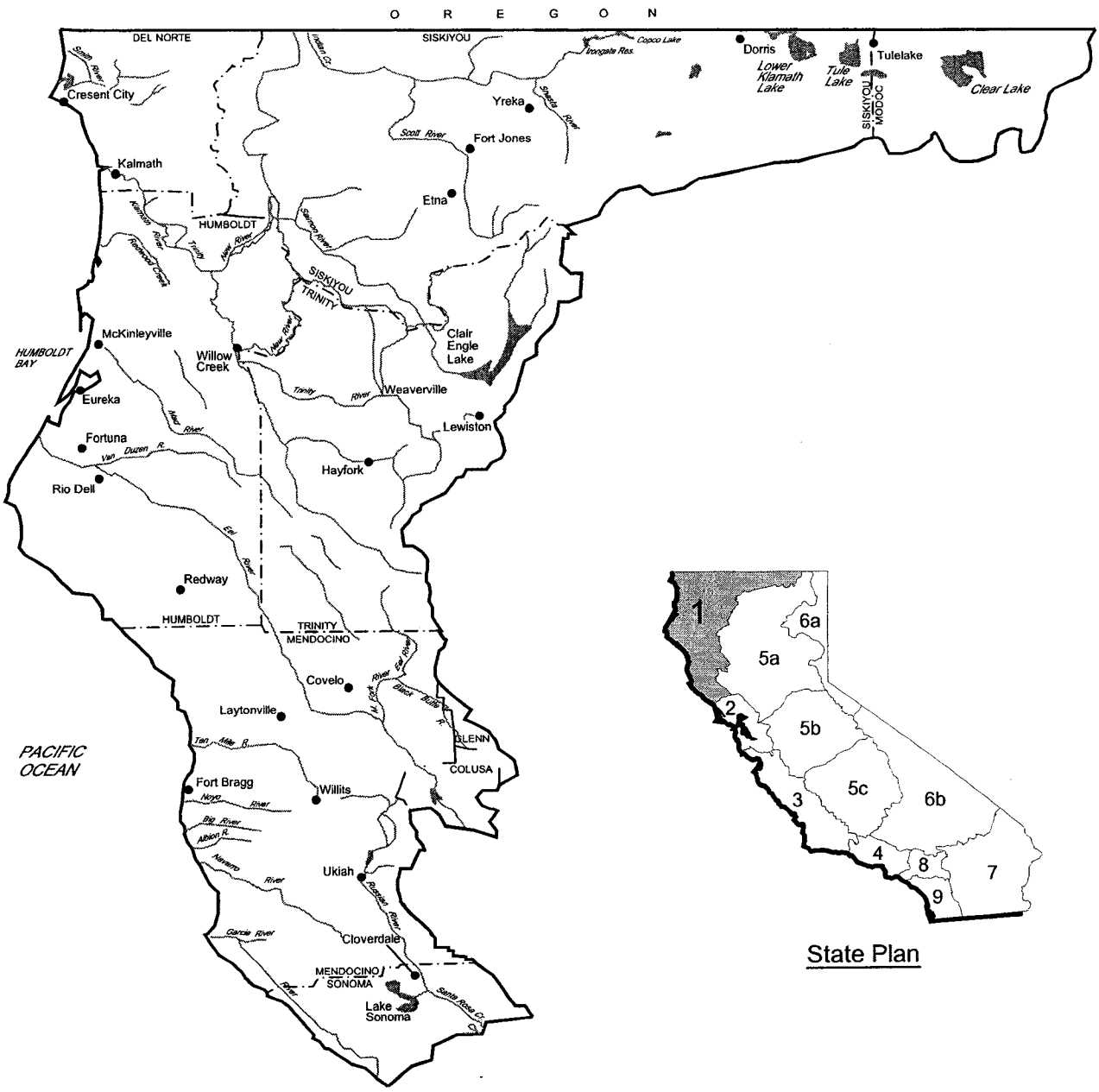
6.0 CONTACT INFORMATION

Plan kept at address: 2600 Camino Ramon Room 3E000A
San Ramon, California 94583

Primary Contact Name: Jay Maille
Primary Contact Phone: (925) 823-7430

FIGURES

DRAWING NUMBER	REGION 1
APPROVED BY	
CHECKED BY	
DRAWN BY	RD 10/19/06
OFFICE	CON
X-REF	---
IMAGE	---



State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

Shaw® Shaw Environmental, Inc.

PREPARED FOR:
AT&T CORP.

FIGURE 1

NORTH COAST
REGION 1 VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD 10/19/06			REGION 2

State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

N

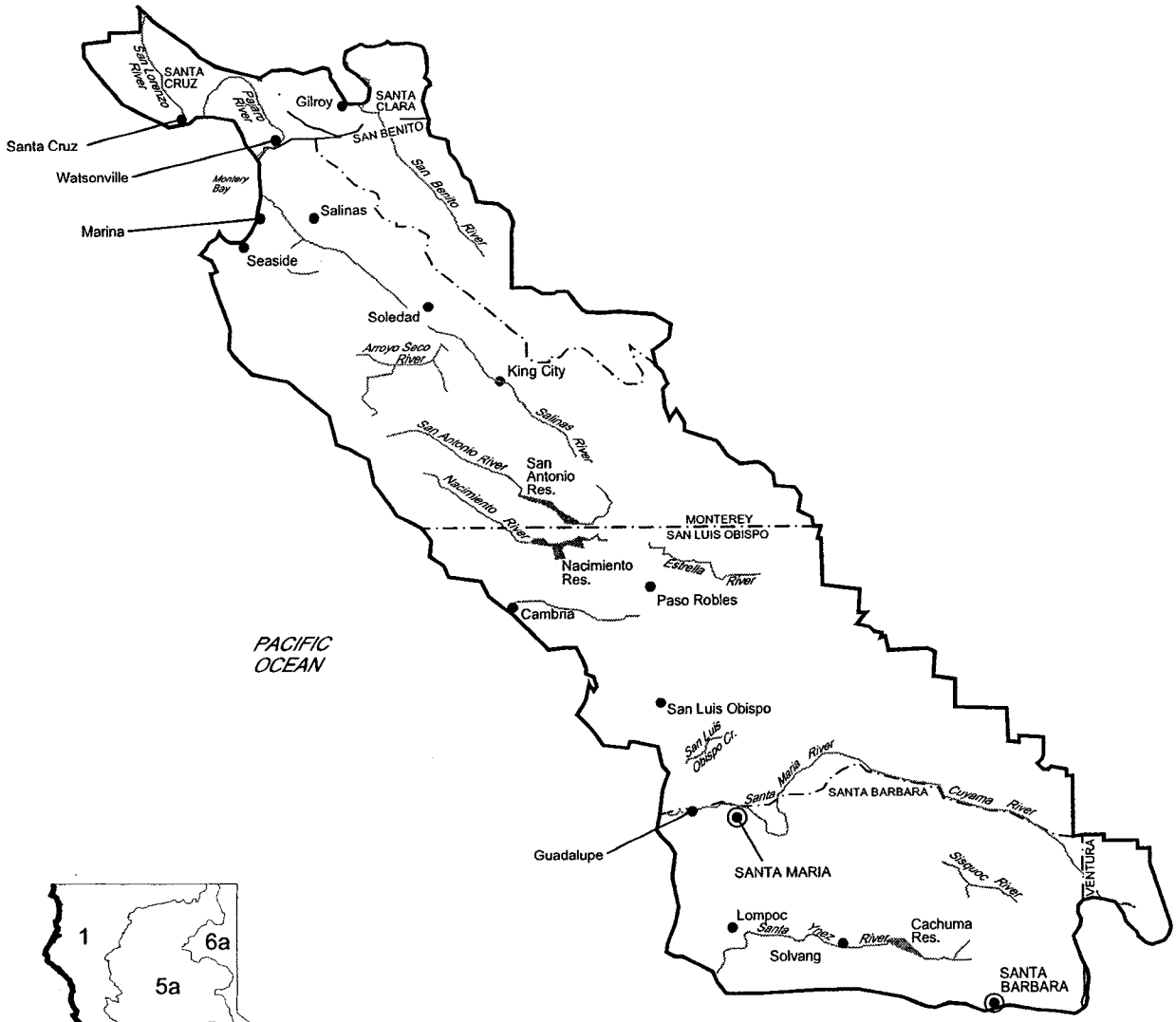
Shaw® Shaw Environmental, Inc.

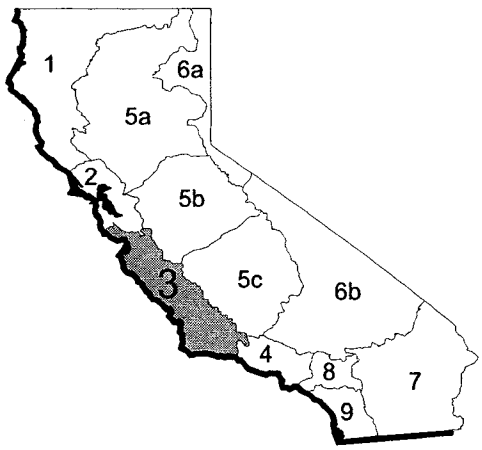
PREPARED FOR:
AT&T CORP.

FIGURE 2

SAN FRANCISCO BAY
REGION 2 VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD	10/19/06			REGION 3





State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

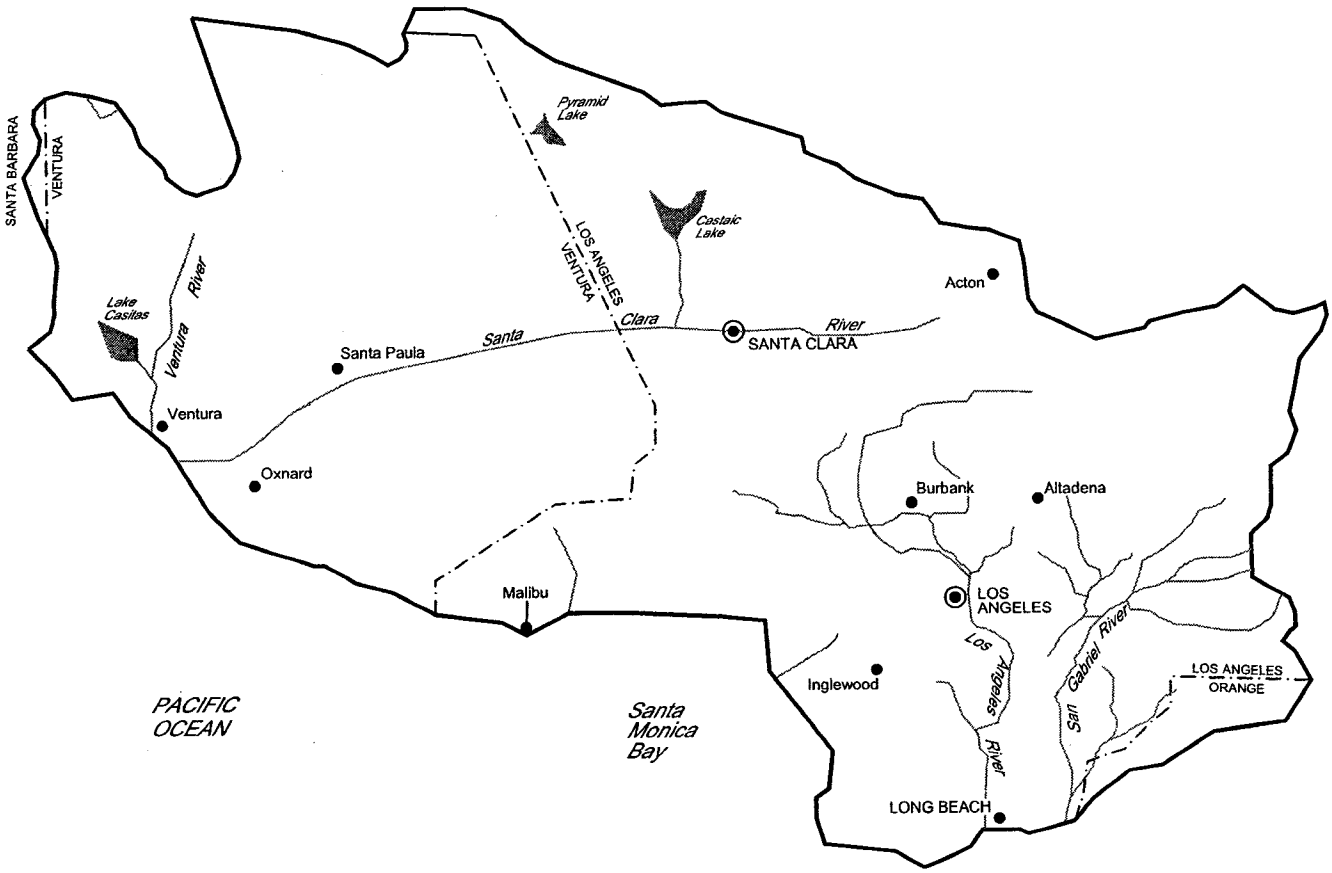
Shaw® Shaw Environmental, Inc.

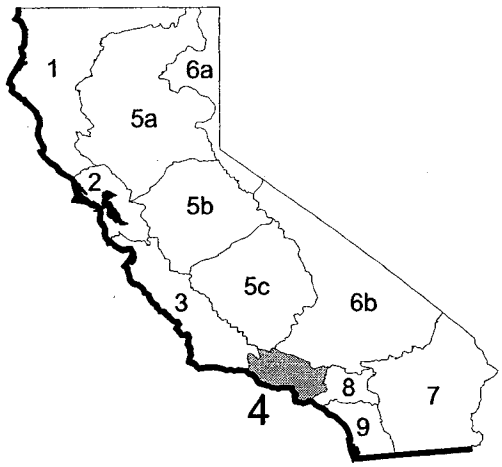
PREPARED FOR:
AT&T CORP.

FIGURE 3

CENTRAL COAST
REGION 3 VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD 10/19/06			REGION 4





State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

N

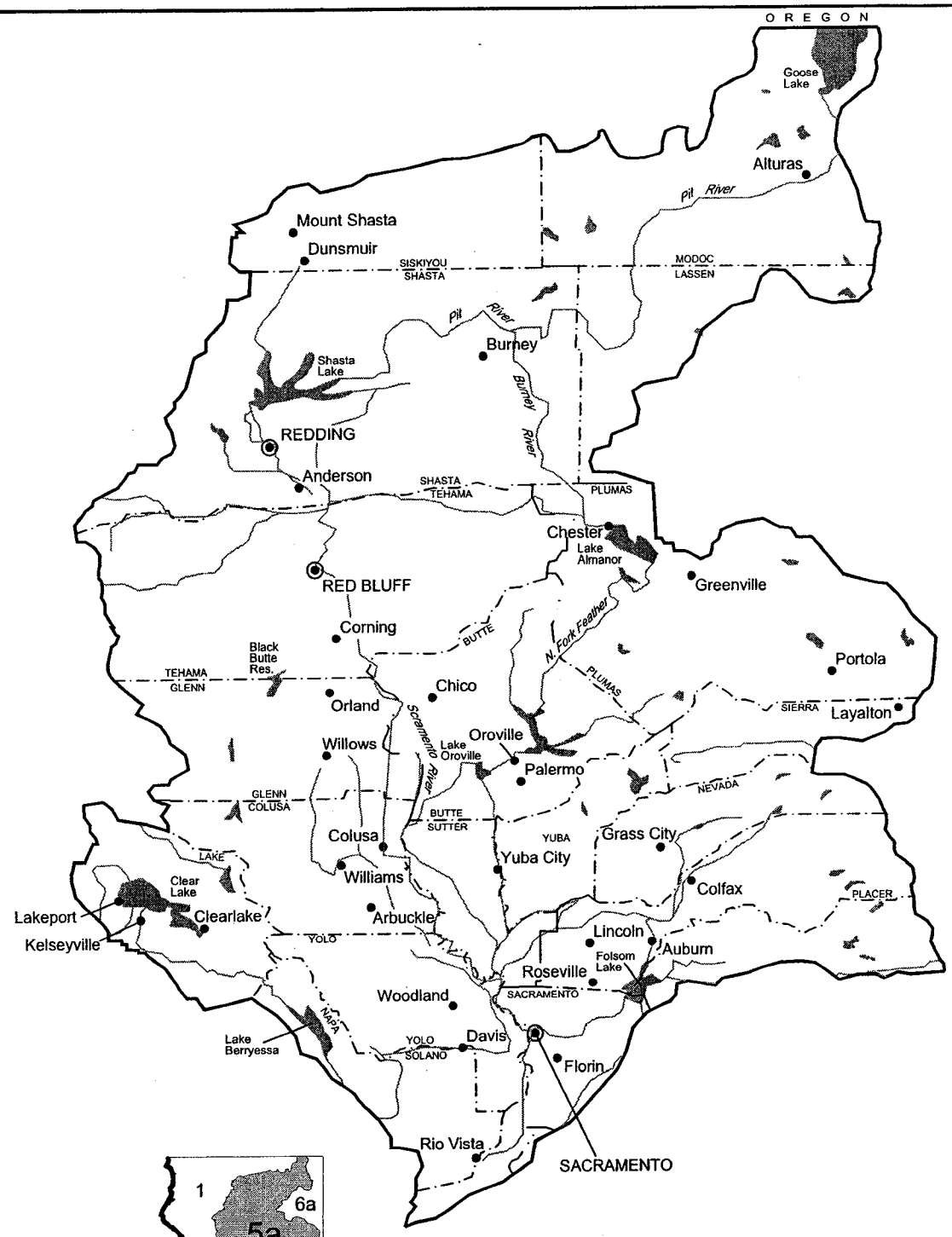
Shaw® Shaw Environmental, Inc.

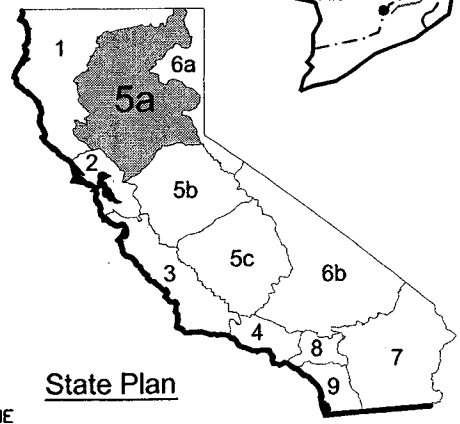
PREPARED FOR:
AT&T CORP.

FIGURE 4

LOS ANGELES
REGION 4 VICINITY MAP

DRAWING NUMBER	REGION 5A
APPROVED BY	
CHECKED BY	
DRAWN BY	RD 10/19/06
OFFICE	CON
X-REF	---
IMAGE	---





LEGEND

RIVER

LAKE

COUNTY LINE

State Plan

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

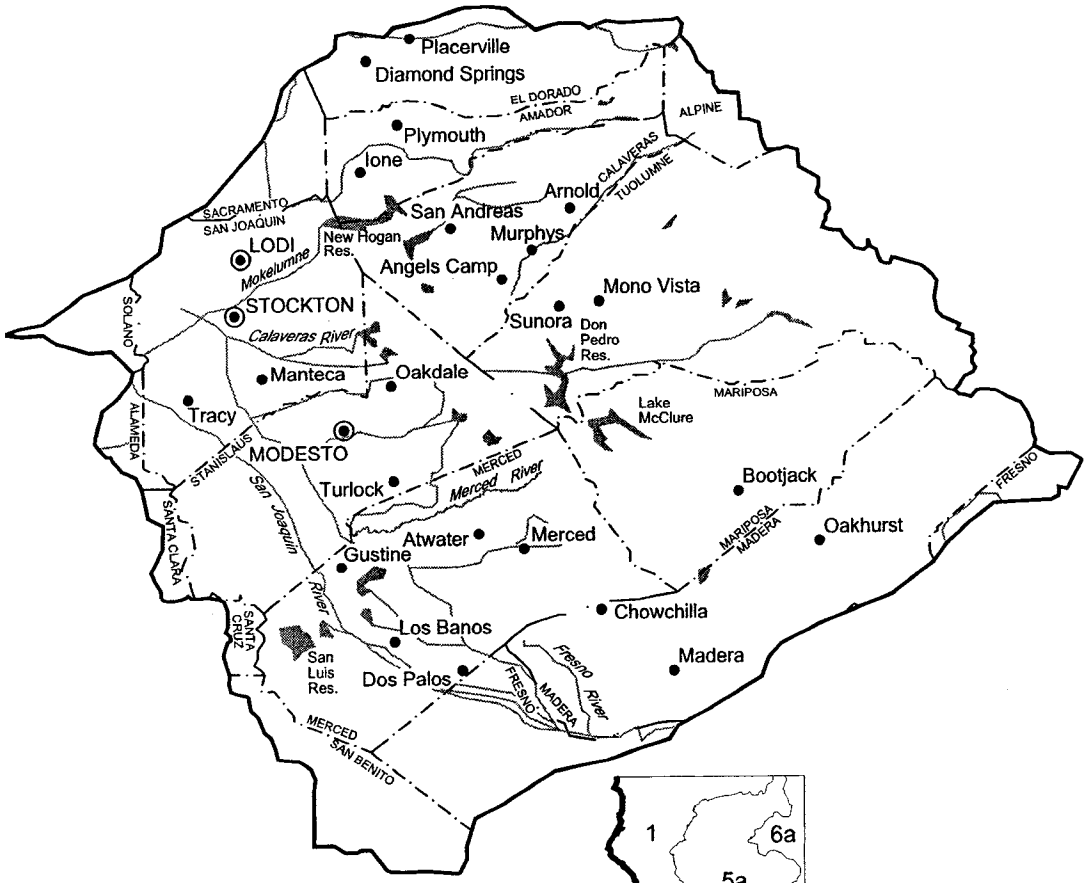
Shaw® Shaw Environmental, Inc.

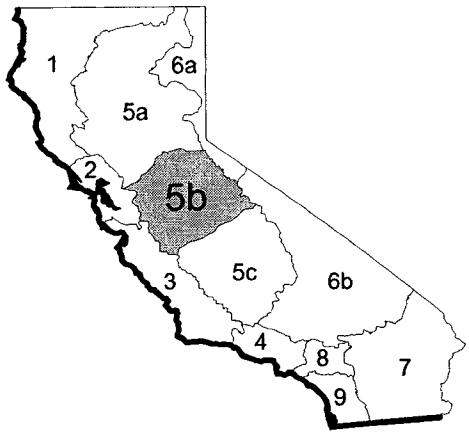
PREPARED FOR:
AT&T CORP.

FIGURE 5A

CENTRAL VALLEY
REGION 5A VICINITY MAP

DRAWING NUMBER	REGION 5B
APPROVED BY	
CHECKED BY	
DRAWN BY	RD 10/19/06
OFFICE	CON
X-REF	---
IMAGE	---





State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

N

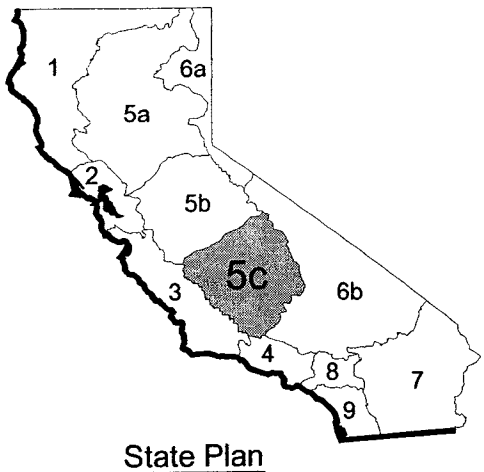
Shaw® Shaw Environmental, Inc.

PREPARED FOR:
AT&T CORP.

FIGURE 5B

CENTRAL VALLEY
REGION 5B VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD	10/19/06			REGION 5C



State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

N

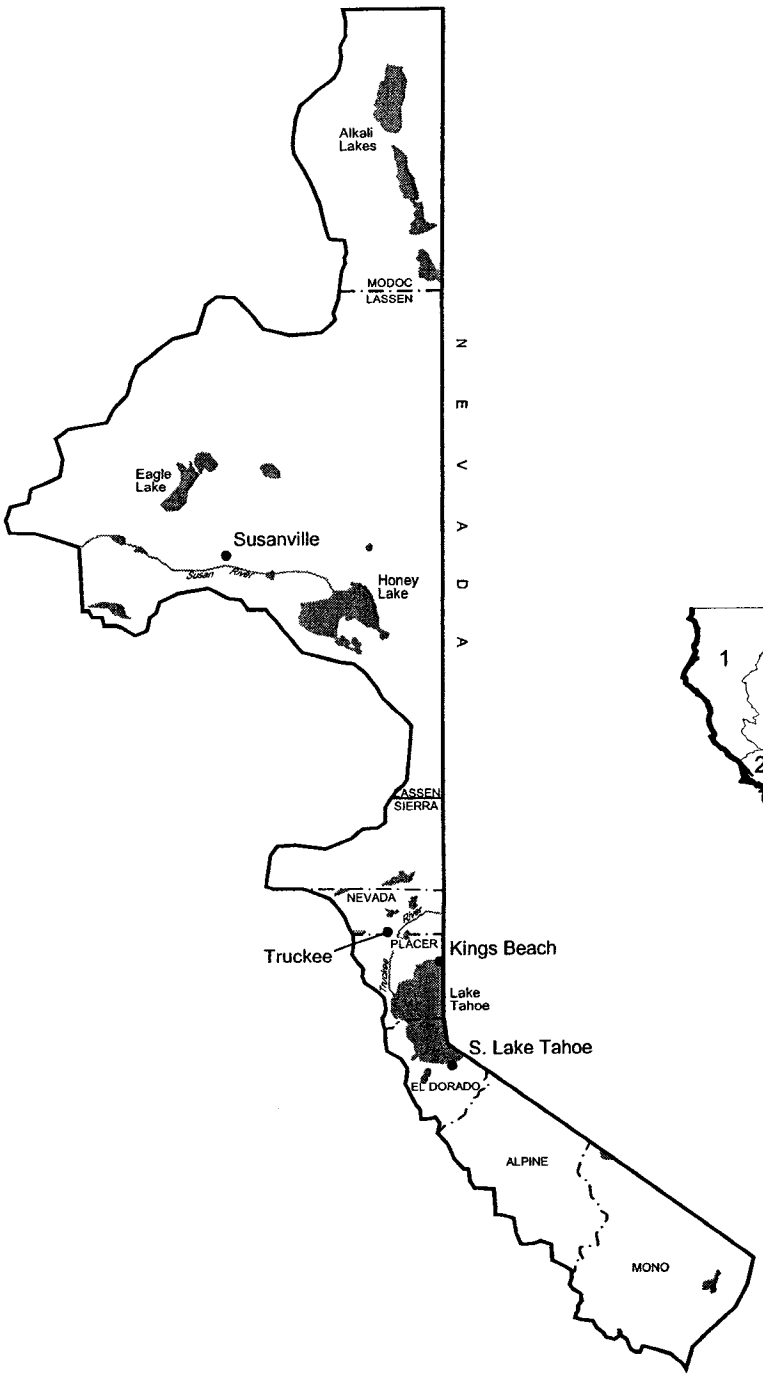
Shaw® Shaw Environmental, Inc.

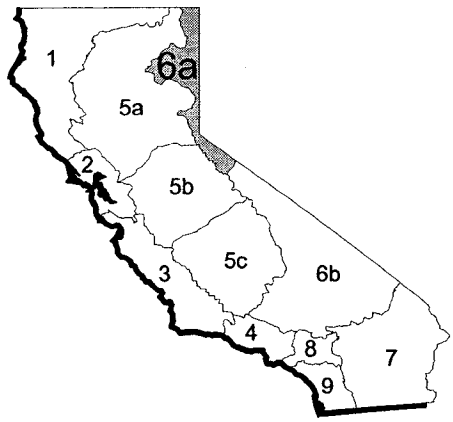
PREPARED FOR:
AT&T CORP.

FIGURE 5C

CENTRAL VALLEY
REGION 5C VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD 10/19/06			REGION 6A





State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

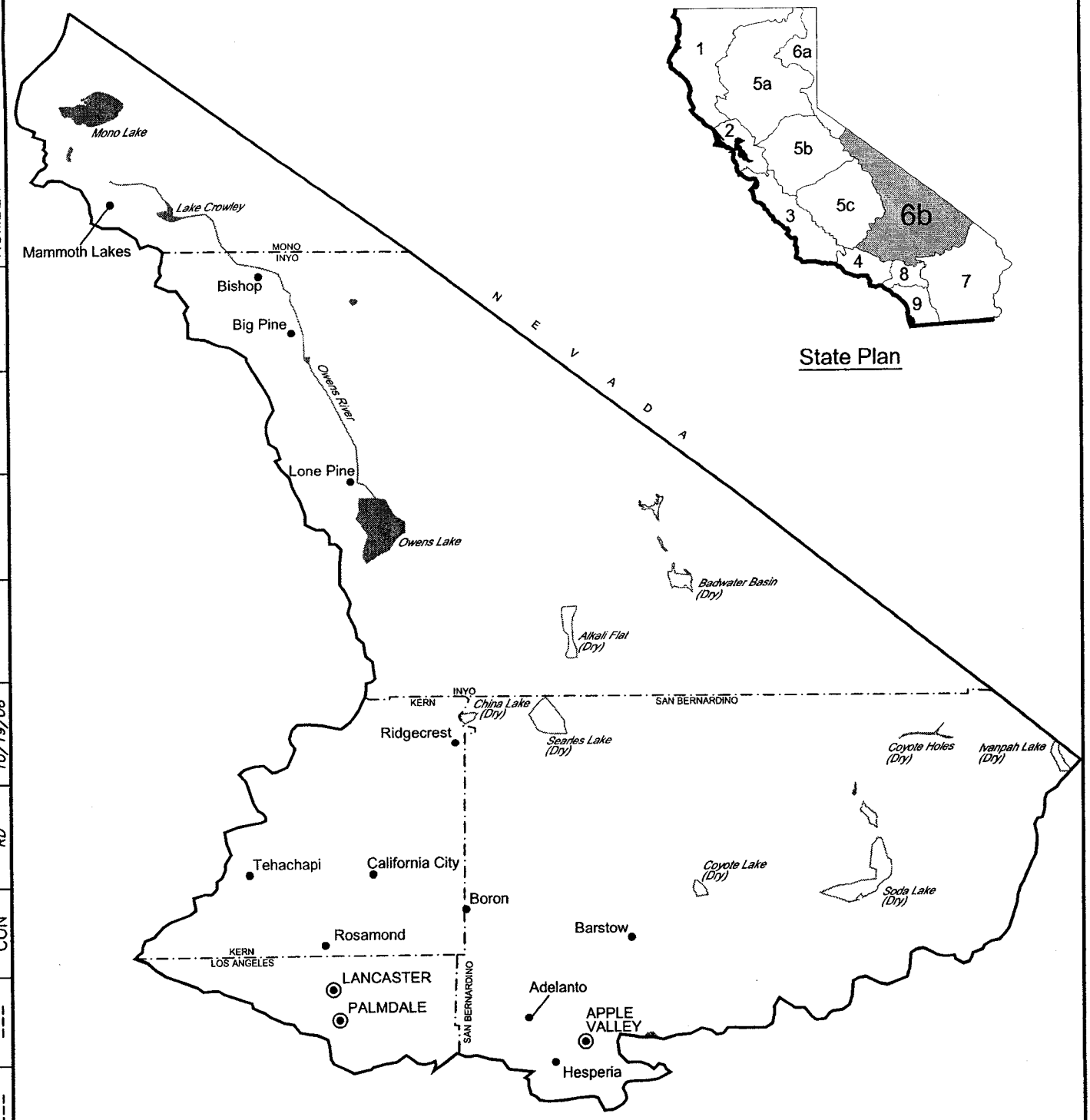
BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

Shaw® Shaw Environmental, Inc.

PREPARED FOR:
AT&T CORP.

FIGURE 6A

LAHONTAN
REGION 6A VICINITY MAP



DRAWING NUMBER	REGION 6B
APPROVED BY	
CHECKED BY	
DRAWN BY	RD
	10/19/06
OFFICE	CON
X-REF	---
IMAGE	---

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

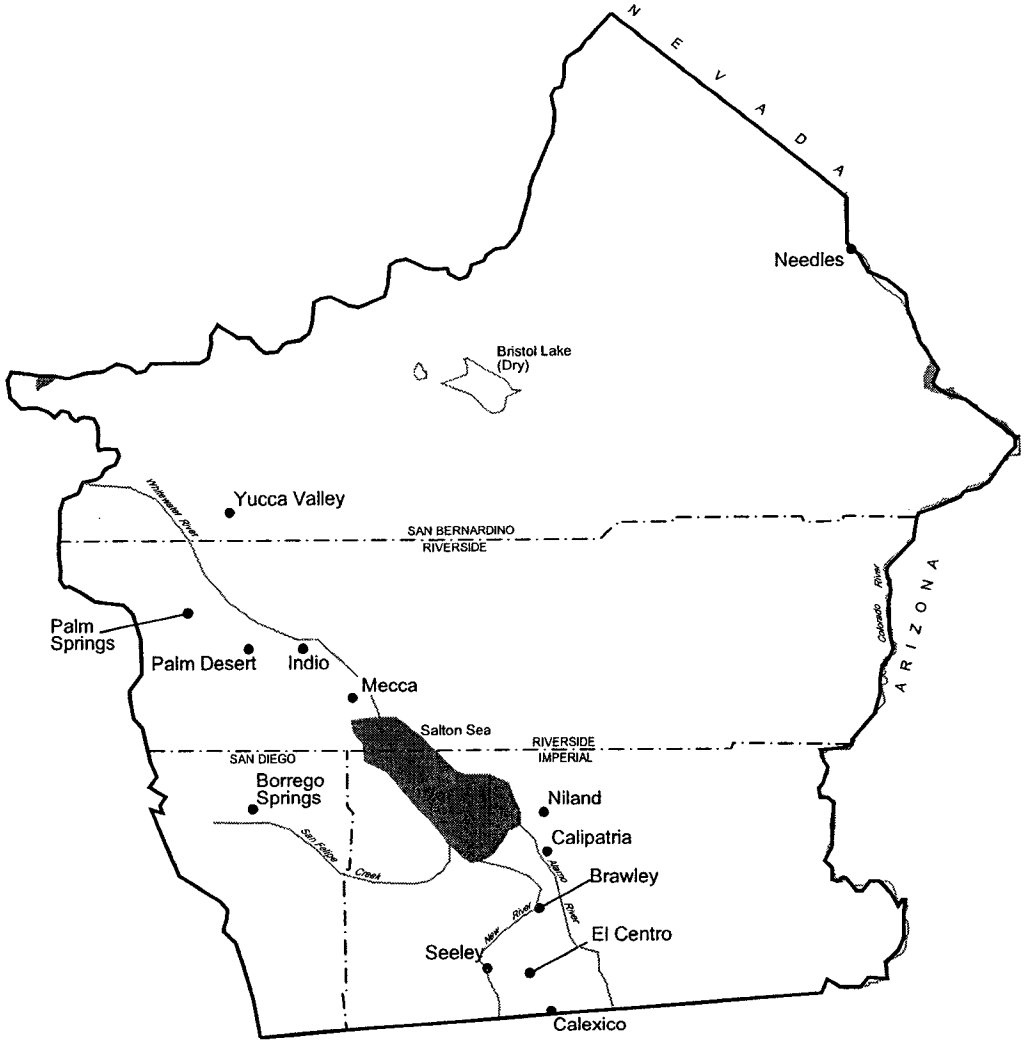
Shaw® Shaw Environmental, Inc.

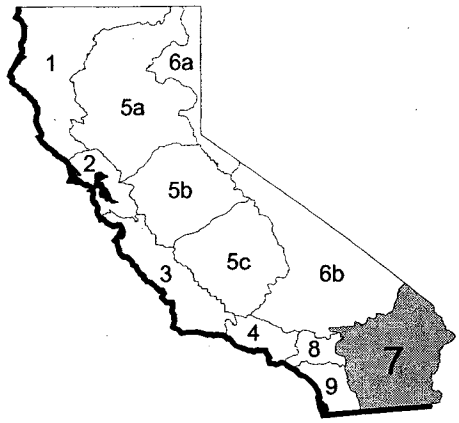
PREPARED FOR:
AT&T CORP.

FIGURE 6B

LAHONTAN
REGION 6B VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD	10/19/06			REGION 7





State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

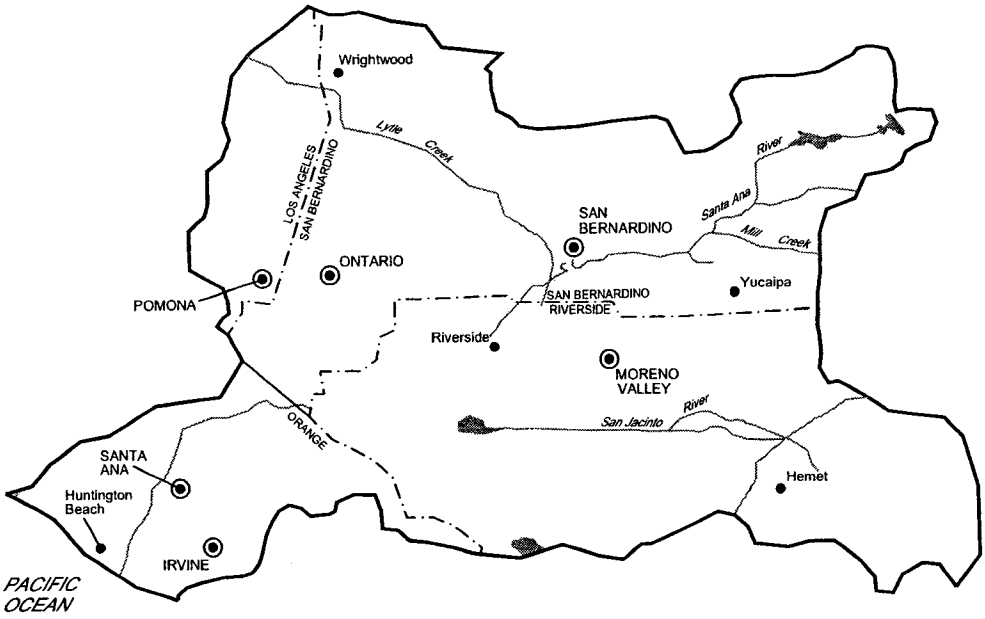
Shaw® Shaw Environmental, Inc.

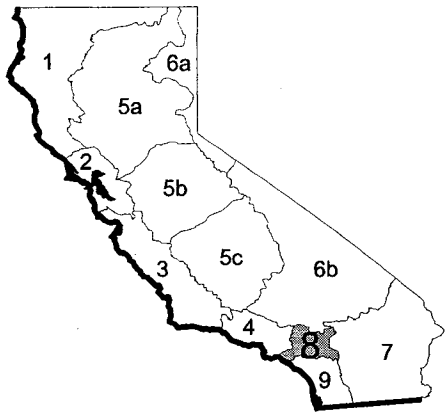
PREPARED FOR:
AT&T CORP.

FIGURE 7

COLORADO RIVER BASIN
REGION 7 VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD	10/19/06			REGION 8





State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

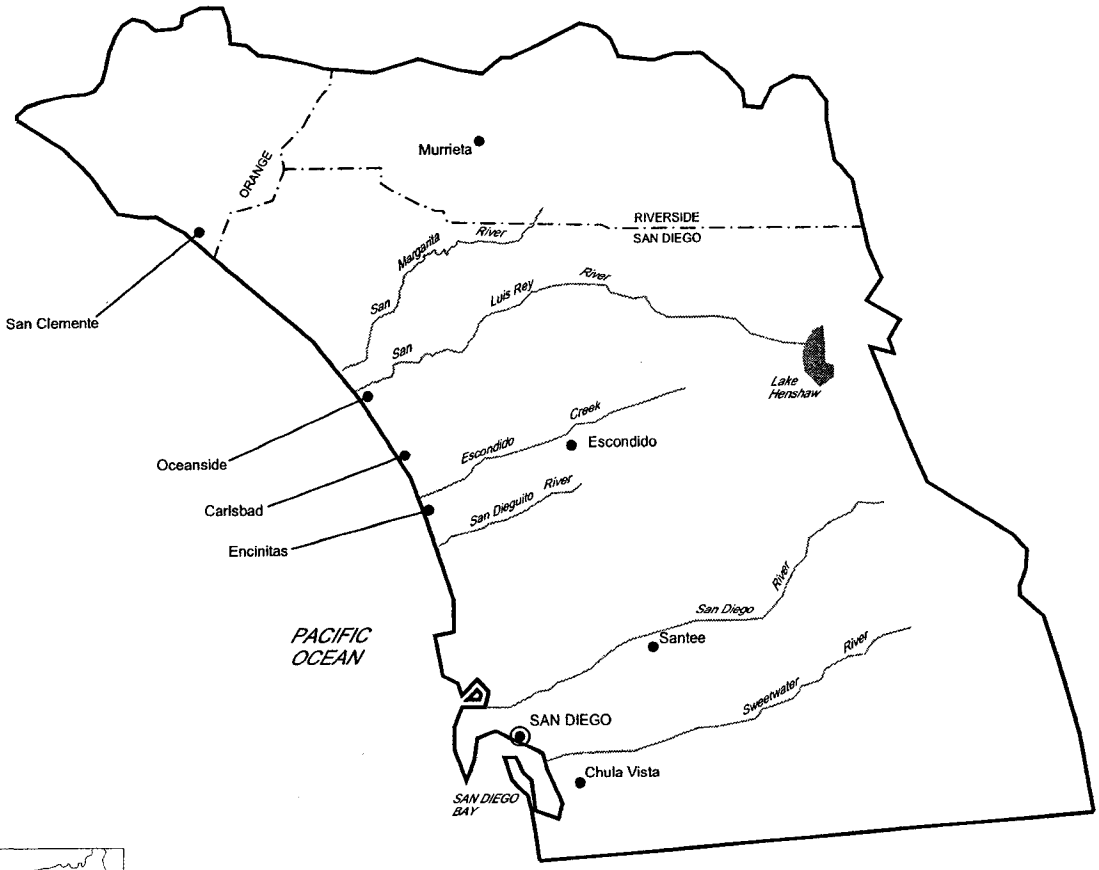
Shaw® Shaw Environmental, Inc.

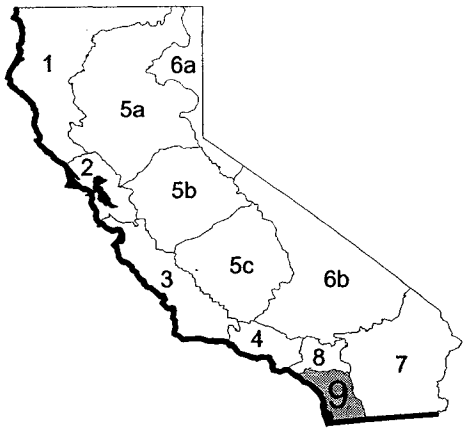
PREPARED FOR:
AT&T CORP.

FIGURE 8

SANTA ANA
REGION 8 VICINITY MAP

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY	APPROVED BY	DRAWING NUMBER
---	---	CON	RD	10/19/06			REGION 9





State Plan

LEGEND

RIVER

LAKE

COUNTY LINE

APPROXIMATE SCALE

0 30 60 MILES

BASE MAP PREPARED BY WATER MANAGEMENT CONSULTANTS FOR AT&T CORPORATION

Shaw® Shaw Environmental, Inc.

PREPARED FOR:
AT&T CORP.

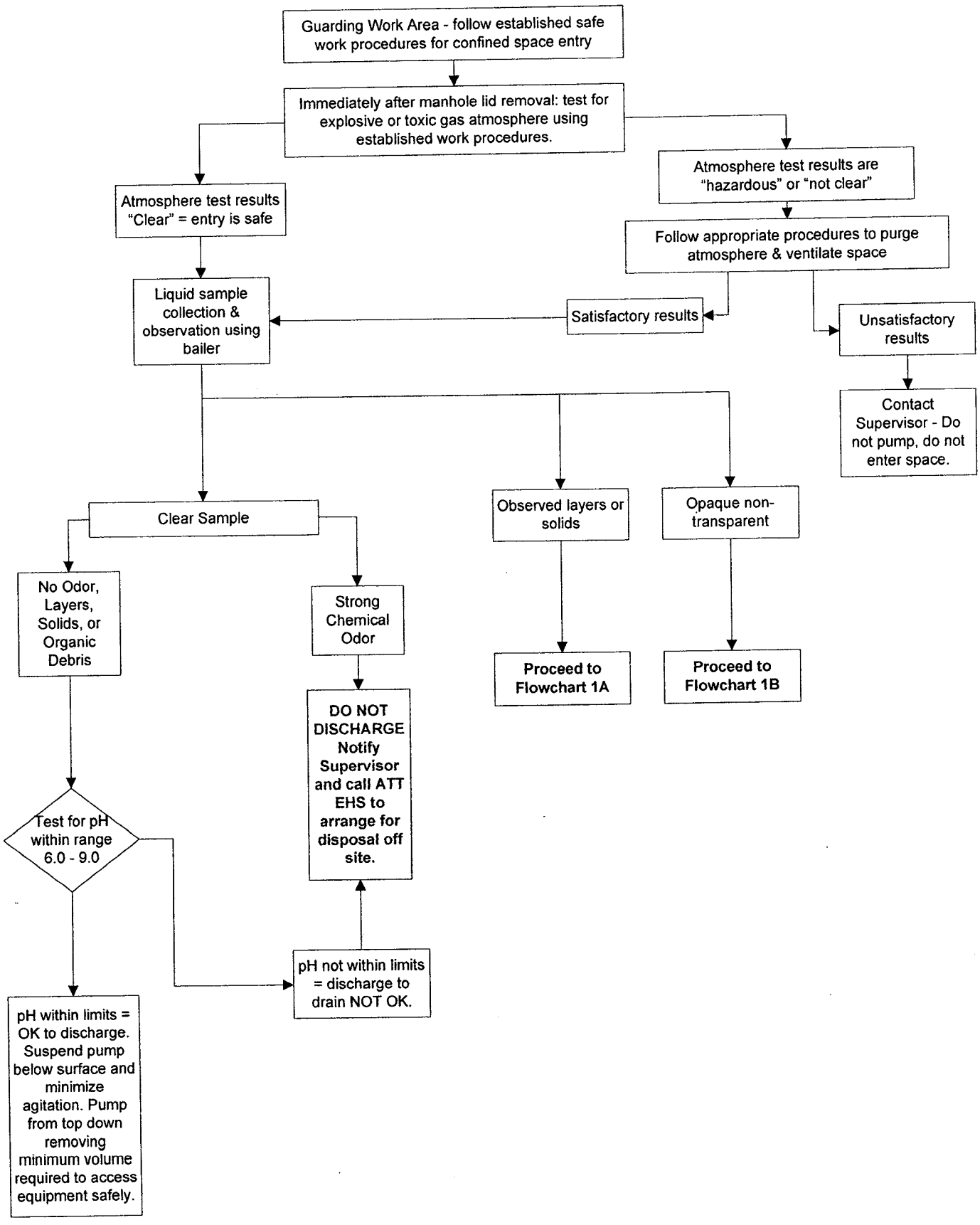
FIGURE 9

SAN DIEGO
REGION 9 VICINITY MAP

Appendix A: FlowCharts

Utility Manhole & Vault De-Watering Decision Guide

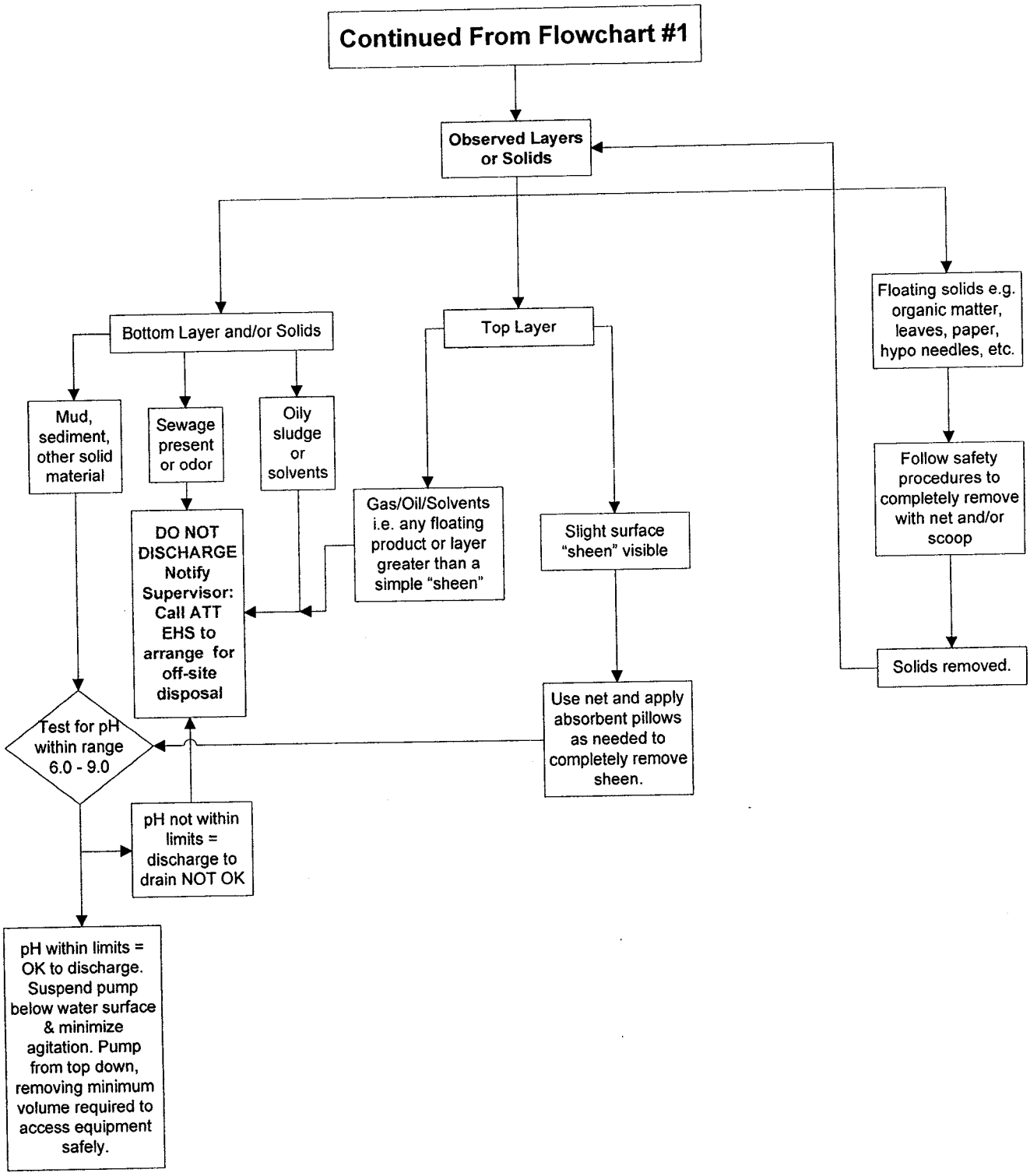
Flow Chart #1

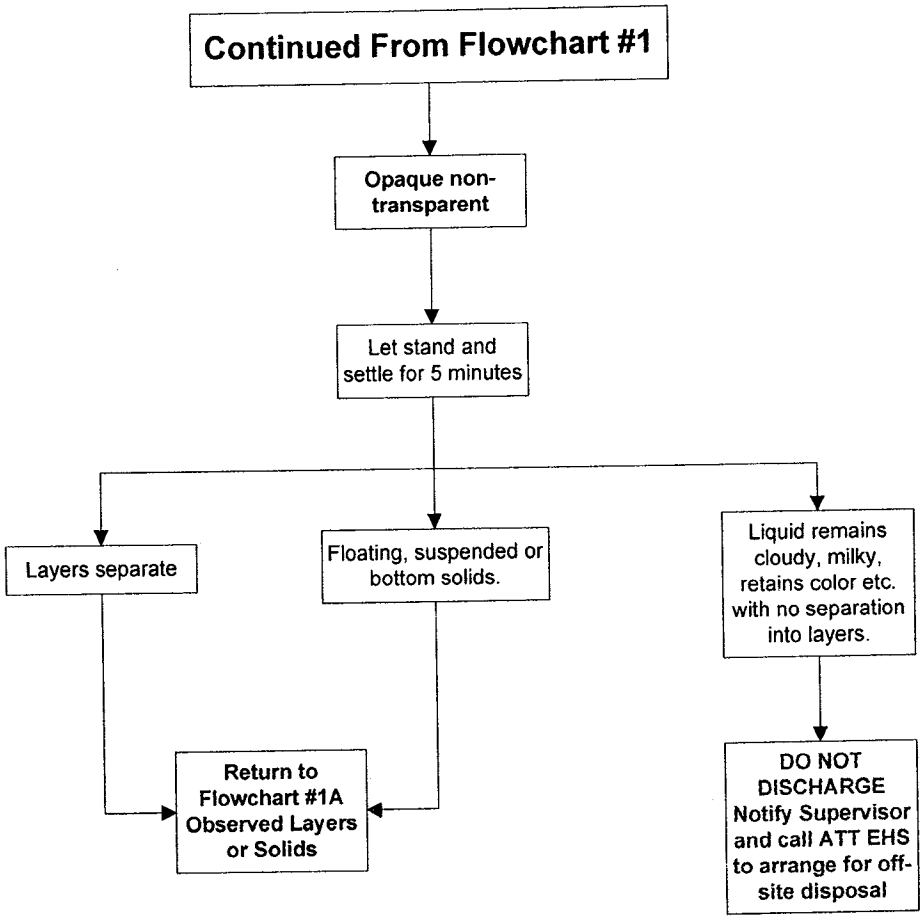


JPM 110306

Utility Manhole & Vault De-Watering Decision Guide

Flow Chart #1A



Utility Manhole & Vault De-Watering Decision Guide

Flow Chart #1B